1001705

TSD File Inventory Index

Date September 20, 2005

Initial CMMerceros

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Facility Identification Number ILD 006 331 342

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Comments _____

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY - REGION 5
WASTE, PESTICIDES AND TOXICS DIVISION
ENFORCEMENT AND COMPLIANCE ASSURANCE BRANCH

COMPLIANCE EVALUATION INSPECTION REPORT

FACILITY NAME:	Southern Illinois University, Edwardsville
FACILITY ADDRESS:	Edwardsville, Illinois EPA I.D. No.: ILD 006 331 342
OPERATOR:	
FACILITY TYPE:	SQG
FACILITY REPRESENTATIVES:	David McDonald, Manager Environmental Health and Safety Nanci Villotti, Safety Officer Environmental Health and Safety
US EPA INSPECTOR:	Robert Dean Smith Environmental Scientist
IEPA INSPECTOR:	Mike Grant
DATE OF INSPECTION:	March 28, 30 & May 1, 2003
NAIC CODE:	
INSPECTION PRIORITY, SECTOR AND/OR PROCESS:	State University
PBTs:	

FACILITY BACKGROUND

Southern Illinois University, Edwardsville, (SIUE) has submitted numerous Notification of Hazardous Waste Activity (Notification) forms to U.S. EPA beginning on April 7, 1987. On this date, SIUE identified itself as a RCRA storage facility. Again on March 12, 1992, SIUE again identified itself as a RCRA storage facility. Rather than completing a RCRA Part B permit, SIUE elected to close the storage area. IEPA certified closure on February 4, 1993.

Prior the multimedia inspection, U.S. EPA's files indicated that SIUE was a conditionally exempt small quantity generator of hazardous waste. SIUE presented a Notification to U.S. EPA on April 30, 2003 which identified itself as a Small Quantity Generator of Hazardous Waste.

is a small quantity generator of hazardous waste.

SIUE submitted a subsequent Notification of Regulated Waste Activity (notification) to U.S. EPA on March 6, 2002. SIUE identified itself as a small quantity generator of hazardous waste (100 to 1000 kg/mo or 220 - 2,200 lbs/mo). SIUE also listed the following listed hazardous wastes on the notification: F002, F003, F005, F027, U038, U129, U134, U165, U188, U211, and U240. Characteristic wastes listed on the notification are: D006, D007, D008, D009, D011, D013, D018, D022, and D028. Analysis of the hazardous waste manifests supported the small quantity generator status.

SIUE generates hazardous waste in the Science Building, the Art and Design Building, and the Supporting Services Building. Biology and chemistry laboratories are found in the Science Building. The Art Department and photographic studios are located in the Art and Design Building. The maintenance shop, mechanical shop, and paint shop generate hazardous waste at the Support Services Building. The Engineering Department has also generated hazardous wastes in the past. The less-than-90 day accumulation is located in the Science Building.

The Environmental Health and Safety Department (EHS) uses a fee system to help fund the hazardous waste program. A fee is charged to each university department for the waste that is processed and disposed of by EHS. No additional charge is added to the fee; the fee is in total the cost of disposal. Safety Kleen is the primary facility that SIUE utilizes for waste management services.

EHS also operates a chemical exchange program where useful chemicals are gathered and redistributed to those who need the chemicals. SIUE is considering offering the Habitat for Humanity unused paint. The state's prison system has been sent floor cleaner rather than disposing the cleaner as a hazardous waste.

Facility Inspection

The first area inspected was the less than 90 day accumulation area. The area is located in an attached room in the back of the Science Building. The room is designed specifically to manage hazardous waste. Blow out panels are located in the walls and the electrical system is explosion proof. SIUE accumulated smaller containers (i.e. gallon size, 1 or 2 liter bottles, steel containers) are found in plastic tubs that serve as secondary containment.

- One 55 gallon drum of paint thinner from the Art/Design Building was observed in the accumulation area. The drum

was labeled and closed.

- Thermostats were observed with a attached universal waste sticker.
- one plastic tub with one glass vial/jar of sodium cyanide
- one plastic tub with four labeled containers: solvent, ethylene chloride, cornelin, and solvent
- one plastic tub with ferric chloride in a one gallon jar
- one plastic tub with four labeled gallon containers
- one plastic tub with saline with fluroatine
- one plastic tub with saline with ceratonine
- one plastic tub with "moist away metal protector"
- one plastic tub with floor finish

One doorway leads to the outside; a second doorway leads into the general store room. The general store room holds useful chemical products. Chemicals are first brought to this room before being placed in the less than 90 day storage (if determined to be waste). The storeroom has a variety of chemicals that are cataloged and ready to be distributed to those who need the chemicals.

The general storeroom also had a cart with 6 containers of chemicals awaiting classification.
The following laboratories were inspected in the Science Building:

- Chemistry Room 2212, Fluorine Chemistry: one ½ gallon glass container, labeled and closed. One labeled glass container, 1 liter in size, was observed in the hood
- Chemistry Room 2211, one container of labeled waste was located in the hood
- Chemistry Room 2210, no waste
- Chemistry Room 2209, Organic Research, one container of chlorinated organic waste
- Chemistry Room 2215, one 4 liter bottle with a funnel in the mouth and open. A final exam was currently in process and students were placing waste in the bottle
- Biology Room 3212, one 4 liter container, organic waste and one 1 liter container of phenol/choritane
- Biology 3210C, Virology, one 4 liter container of waste, with funnel in mouth, **not closed**
- Biology 3216, no waste

Art and Design Building

- one plastic 55 gallon drum, fixer, labeled and marked, located in the photography area
- one drum of paint thinner in the art department. Marked turpentine
- Room 1117c, one container of solvent rags

Facilities management Buildings

- waste oil was observed, labeled
- one drum of waste ethylene glycol, labeled
- Flourescent bulbs were observed, labeled and properly stored

Paperwork Review

The paperwork requirements for a small quantity generator is much less than those requirements for a large quantity generator. The following explains the requirements as well as the observations made during the inspection.

The personnel training requirements for a SQG are only that the waste handlers are "thoroughly familiar with proper waste handling and emergency procedures, relevant to their responsibilities during normal facility operations and emergencies." (40 CFR 262.34(d)(5)(iii). Training was fully documented and based on the requirements for a LQG. No violations or concerns were observed.

No contingency plan is required, however, SIUE has a full contingency plan that more than covers the requirements for a SQG.

Review of the hazardous waste manifests/LDR forms confirmed that SIUE is a small quantity generator of hazardous waste. There were no violations or concerns observed.

Inspections were found to be complete and no violations or concerns were observed.

Conclusion

SIUE is a small quantity generator of hazardous waste. The facility inspection revealed only one potential violation: one 1-liter glass bottle of hazardous waste with a funnel in the mouth of the container and was not stored closed. This observation was in a hood located in the Science Building, Biology Room 3210C, Virology. 35 IAC 725.273(a) and 40 CFR 265.173(a) requires hazardous waste storage containers to be stored closed except for when adding or removing waste from the container.

No paperwork violations or concerns were identified.

FEB 1 3 1995

HRE-8J

Mr. David E. McDonald
Coordinator for Environmental Health & Safety
Southern Illinois University Edwardsville
P.O. Box 1657
Edwardsville, Illinois 62026

Re: Letter of Acknowledgement
Southern Illinois University
(Edwardsville)
ILD 006 331 342

Dear Mr. McDonald:

On December 29, 1994, the United States Environmental Protection Agency (U.S. EPA) issued Southern Illinois University (Edwardsville) a Notice of Violation (NOV) which identified violations of 35 Illinois Administrative Code Parts 722 and 728. On January 27, 1995, U.S. EPA received your response to that NOV. This letter is to inform you that U.S. EPA have reviewed your response and determined that additional enforcement action need not be taken at this time.

This position does not limit your liability for compliance with all the applicable provisions of the Resource Conservation and Recovery Act (RCRA), as amended. Your hazardous waste management operations will continue to be evaluated by U.S. EPA and the Illinois Environmental Protection Agency in the future.

If you have any questions and/or concerns regarding this matter, please contact Barbara Russell of my staff at (312) 353-7922.

Sincerely yours,

Janet Haff, Acting Section Chief
Enforcement Program Section
RCRA Enforcement Branch

cc: Glenn Savage, IEPA
William Radlinski, IEPA

bcc: J. Boyle
File

B.RUSSELL:ev:02/07/95:DISK #:FILENAME:SAVSIUE

SIGNATURE/INITIAL CONCURRENCE REQUESTED - RCRA ENFORCEMENT BRANCH (REB)								
SC/BR/OFC SECRETARY	2/13/95							
INITIATOR /AUTHOR	IL/IN TES CHIEF	MI/WI TES CHIEF	MN/OH TES CHIEF	IL/MI/WI EPS CHIEF	IN/MN/OH EPS CHIEF	REB BRANCH CHIEF	RCRA ASSOC. DIR.	WMD DIVISION DIRECTOR
BR 2/13/95				2/13/95				

Southern Illinois University at Edwardsville
Environmental Health and Safety
Box 1657
Edwardsville, Illinois 62026

January 17, 1995

United States Environmental Protection Agency
Attention: HRE-8J
Region 5
77 West Jackson Boulevard
Chicago, IL 60604-3590

Subject: Notice of Violation
Southern Illinois University at Edwardsville
Edwardsville, Illinois
ILD 006 331 342

Dear Mr. Dimock,

I am providing the following response to your letter dated December 28, 1994:

- *Failure to make arrangements with local authorities, as required by 35 Ill. Adm. Code 725.137/722.134(d)(4).*

Response

The University has a contractual agreement with the Edwardsville Fire Department to respond to emergencies, including chemical spills. The fire department has responded to numerous chemical emergencies in the past in addition to conducting on-site inspections. As a result, the fire department is very familiar with the types and quantities of chemicals handled on campus. However, to satisfy the regulatory requirement I am sending the attached letter to the Fire Chief.

In addition, the police agency for the campus is the University Police. The police are also familiar with the types and quantities of chemicals handled on campus. They have also responded to numerous chemical incidents on campus. I will send them a memo to formalize this arrangement as you requested.

Anderson Memorial is the nearest hospital facility to the campus. I have contacted them by phone and I am also sending the attached follow-up correspondence notifying them of the types and quantities of chemicals on campus.

For your information, the University has hired a Safety Officer who will start on January 23, 1995. The Safety Officer will be working closely with the agencies listed above in regard to emergency response procedures. He will also be maintaining the chemical inventory list and Material Safety Data Sheets for the University.

- *Failure to send a land ban notification with the manifest, as required by 35 Ill. Adm. code 728.107(a)(1).*

Response

I have attached copies of the land ban notifications referenced in your letter. We have also reviewed the manifest file for the past year and have ensured that all land ban notifications are present and available for inspections.

I hope you will find our efforts towards compliance to be satisfactory. It is this department's goal to assist the University in meeting or exceeding environmental health and safety regulatory requirements. With this in mind, we look forward to cooperating with your staff.

Should you have any additional questions concerning this matter please call me at (618) 692-3584.

Sincerely,

David McDonald
Coordinator for Environmental Health and Safety

attachments

Southern Illinois University at Edwardsville
Environmental Health and Safety
Box 1657
Edwardsville, Illinois 62026

January 19, 1995

Dear Chief McDonald:

Pursuant to our telephone conversation, I am providing this notice as required by the Illinois Environmental Protection Agency, 35 Illinois Administrative Code 725.137. The above referenced code specifies that the University must alert emergency agencies such as the local fire department, police department and hospital that the University may need assistance in responding to a chemical incident such as a spill or explosion.

The University has a diverse range of organic and inorganic chemicals at the Edwardsville campus. Should a chemical emergency arise, your assistance may be necessary. In light of this, the University's Safety Officer will be meeting with you in the next few days to coordinate emergency planning and to notify you of the types and quantities of hazardous materials on campus.

Should you have any questions, please let me know.

Sincerely,

David McDonald
Coordinator for Environmental Health and Safety

Southern Illinois University at Edwardsville
Environmental Health and Safety
Box 1657
Edwardsville, Illinois 62026

January 19, 1995

Dear Linda Robert:

Pursuant to our telephone conversation, I am providing this notice as required by the Illinois Environmental Protection Agency, 35 Illinois Administrative Code 725.137. The above referenced code specifies that the University must alert emergency agencies such as the local fire department, police department and hospital that the University may need assistance in responding to a chemical incident such as a spill or explosion.

The University has a diverse range of organic and inorganic chemicals at the Edwardsville campus. Should a chemical emergency arise, your assistance may be necessary. In light of this, the University's Safety Officer will be meeting with you in the next few days to coordinate emergency planning and to notify you of the types and quantities of hazardous materials on campus.

Should you have any questions, please let me know.

Sincerely,

David McDonald
Coordinator for Environmental Health and Safety

Southern Illinois University at Edwardsville
Environmental Health and Safety
Box 1657
Edwardsville, Illinois 62026

January 19, 1995

Dear Chief Henson:

Pursuant to our telephone conversation, I am providing this notice as required by the Illinois Environmental Protection Agency, 35 Illinois Administrative Code 725.137. The above referenced code specifies that the University must alert emergency agencies such as the local fire department, police department and hospital that the University may need assistance in responding to a chemical incident such as a spill or explosion.

The University has a diverse range of organic and inorganic chemicals at the Edwardsville campus. Should a chemical emergency arise, your assistance may be necessary. In light of this, the University's Safety Officer will be meeting with you in the next few days to coordinate emergency planning and to notify you of the types and quantities of hazardous materials on campus.

Should you have any questions, please let me know.

Sincerely,

David McDonald
Coordinator for Environmental Health and Safety

LAND DISPOSAL NOTIFICATION AND CERTIFICATION FORM
SOLVENT AND CALIFORNIA LIST TREATMENT STANDARDS

A) Generator Name: Southern Illinois U USEPA ID# ILD006 331 343

IFR Profile # _____ Manifest #: 08 93727

B) Is this waste a non-wastewater or a wastewater; (See 40 CFR 268.2) Check ONE: X Non-Wastewater ___ Wastewater

C) If this waste is subject to any California List restrictions, enter the Number from below (either I, II or III) next to each restriction that is applicable:

___ HOC's ___ PCB's ___ Acid ___ Metals ___ Cyanides

RBF #	D) US EPA HAZARDOUS WASTE CODE(S)	E) SUBCATEGORY ENTER THE SUBCATEGORY DESCRIPTION IF NOT APPLICABLE SIMPLY CHECK NONE		F) APPLICABLE TREATMENT STANDARDS			G) LAND DISPOSAL RESTRICTION (see below)
				PERFORMANCE BASED CHECK AS APPLICABLE		SPECIFIED TECHNOLOGY IF APPLICABLE ENTER THE 40 CFR 268.42 - TABLE 1 TREATMENT CODE(S)	
		DESCRIPTION	NONE	268.41(a)	268.43(a)	268.42(a)	
1	D001	High Tox				FSUBS, RORG, INCIN	II
2	F003		X	X			I
3							
4							
5							
6							
7							
8							
9							

To list additional USEPA waste code(s) and subcategory(s), use additional Land Disposal Notification and Certification Forms.

Land Disposal Restrictions: In column G above, enter the number (I, II, III, IV, V, VI) below that describes how the waste must be managed to comply with the land disposal regulations (40 CFR 268.7). Please understand that upon signing this form the appropriate certifications as identified below are being made.

I. RESTRICTED WASTE REQUIRES TREATMENT
This waste must be treated to the applicable treatment standards set forth in 40 CFR Part 268 Subpart D, Section 268.32, or RCRA Section 3004(d).

II. RESTRICTED WASTE TREATED TO PERFORMANCE STANDARDS
"I certify under penalty of law that I have personally examined and am familiar with the treatment technology and operation of the treatment process used to support this certification and that, based upon my inquiry of those individuals immediately responsible for obtaining this information, I believe that the treatment process has been operated and maintained properly so as to comply with the performance levels specified in 40 CFR part 268 Subpart D and all applicable prohibitions set forth in 40 CFR 268.32 or RCRA Section 3004(3) without impermissible dilution of the prohibited waste. I am aware that there are significant penalties for submitting a false certification, including the possibility of a fine and imprisonment."

III. RESTRICTED WASTES FOR WHICH THE TREATMENT STANDARD IS EXPRESSED AS A SPECIFIED TECHNOLOGY (AND THE WASTE HAS BEEN TREATED BY THAT TECHNOLOGY).
"I certify under penalty of law that the waste has been treated in accordance with the requirements of 40 CFR 268.42. I am aware that there are significant penalties for submitting a false certification, including the possibility of a fine and imprisonment."

IV. GOOD FAITH ANALYTICAL CERTIFICATION - FOR INCINERATED ORGANICS
"I certify under penalty of law that I have personally examined and am familiar with the treatment technology and operation of the treatment process used to support this certification and that, based on my inquiry of those individuals immediately responsible for obtaining this information, I believe that the non-wastewater organic constituents have been treated by incineration in units operated in accordance with 40 CFR Part 264 Subpart O or Part 265 Subpart O, or by combustion in fuel substitution units operating in accordance with applicable technical requirements, and I have been unable to detect the non-wastewater organic constituents despite having used best good faith efforts to analyze for such constituents. I am aware that there are significant penalties for submitting a false certification, including the possibility of fine and imprisonment."

V. RESTRICTED WASTE SUBJECT TO A VARIANCE
This waste is subject to a national capacity variance, a treatability variance, or a case-by-case extension. Enter the effective date of prohibitions in column G above.

VI. RESTRICTED WASTE CAN BE LAND DISPOSED WITHOUT FURTHER TREATMENT
"I have determined that this waste meets all applicable treatment standards set forth in 40 CFR Part 268 Subpart D, and all applicable prohibition levels set forth in Section 268.32 or RCRA Section 3004(d), and therefore, can be land disposed without further treatment. A copy of all applicable treatment standards and specified treatment methods is maintained at the treatment, storage and disposal facility named above. "I certify under penalty of law that I personally have examined and am familiar with the waste through analysis and testing or through knowledge of the waste to support this certification that the waste complies with the treatment standards specified in 40 CFR Part 268 Subpart D and all applicable prohibition set forth on 40 CFR 268.32 or RCRA section 3004(d). I believe that the information I submitted is true, accurate and complete. I am aware that there are significant penalties for submitting false certification, including the possibility of a fine and imprisonment."

I hereby certify that all information submitted in this and all associated documents is complete and accurate, to the best of my knowledge and information.

Signature: [signature] Title: _____ Date: 02-15-93

Section 3-7-93

Generator Name/Location: SIU - Edwardsville

EPA I.D.Number: ILD 006 331 342 Manifest Number: 493923

Restricted Waste Notification (Category 2)

If you are managing lab pack wastes that are restricted from land disposal (the waste has applicable treatment standards), mark the state below. Note: USEPA has identified labpacks as a special category. Generators must identify the contents of each drum as either organic (1C or organometallic (<100% organic). If the lab pack is 100% organic, you must mark Category 6b below. If the lab pack contains any inorganic waste(s), you must mark Category 6a.

☒ I notify that I am familiar with the waste through analysis and testing or through knowledge of the waste to support this notification that the waste is subject to-t treatment standards specified in 40 CFR 268, Subpart D. Waste must be treated to the appropriate regulatory treatment standard, by the appropriate regulatory treatment method specified below.

Category 6- Lab Pack Certification

☒ X (6a) Organometallic (inorganic)

I certify under penalty of law that I personally have examined and am familiar with the waste and that the lab pack contains only the wastes spe in Appendix IV to Part 268 or solid wastes not subject to regulation under 40 CFR Part 261. I am aware that there are significant penalties for submitting a false certification, including the possibility of fine or imprisonment.

Drum Number Waste Profile Or ARF Number	Category Number	State EPA Waste Number(s)	Corresponding Standard Applicable Variance/Other
~~90-45-1~~	2,6A	D009, D002, F003, U169	[1]Incineration followed by Stabilization
90-45-2		D001, U169	
90-45-3			

☒ (6b) Organic

I certify under penalty of law that I personally have examined and am familiar with the waste through analysis and testing or through knowledge o waste and that the lab pack contains only organic waste specified in Appendix V to Part 268 or solid wastes not subject to regulation under 40 CFR 261. I am aware that there are significant penalties for submitting a false certification, including the possibility of fine or imprisonment.

Drum Number Waste Profile Or ARF Number	Category Number	State EPA Waste Number(s)	Corresponding Standard Applicable Variance/Other
90-45-1	2,6B	U127	[2]Incineration
~~90-45-2~~			

Unrestricted Waste Notification (Category 1)

If you are managing lab pack wastes that are not subject to the land disposal restrictions (the wastes have no applicable treatment standard: mark the statement below.

☐ I notify that I am familiar with the waste through analysis and testing or through knowledge of the waste to support this notification that the waste is not restrict specified in 40 CFR 268, Subpart D and all applicable prohibitions set forth in 40 CFR 268.32 or RCRA Section 3004(d).

Drum Number Waste Profile Or ARF Number	Category Number	State EPA Waste Number(s)	Corresponding Standard Applicable Variance/Other
	1		Not Applicable

SIGNATURE: Reddy K DATE: 07.15.92

PRINT NAME: REDDY SANDAVARAPU TITLE: Env Health Safety

revised: 8/92

1. Five Letter Treatment Code (Table 1 § 268.42) is INCIN fb STABL
2. Five Letter Treatment Code (Table 1 § 268.42) is INCIN

FORM D

REMOVE THIS FORM BEFORE WRITING ANY

LAB PACK LAND DISPOSAL CERTIFICATION

This form MUST be accompanied by the drum inventory sheets

Generator name: Southern Illinois University, Edwardsville

Federal Manifest Document No. 9 3 1 7 9

WPS Number: BI 3508

State Manifest No. IL 465 2829

Check and complete each section that applies to any of the lab packed drums with this manifest. Nonhazardous waste drums do not require this page.

☐ **1. APPENDIX IV DRUMS:**
This notification and certification applies to the following drums on this shipment: (list the drum identification number(s)):

"I certify under penalty of law to support this certification I have personally examined and am familiar with the waste through analysis and testing or through knowledge of the waste, and that the lab pack contains only waste codes specified in Appendix IV to part 268. I am aware that there are significant penalties for submitting a false certification, including the possibility of fine and imprisonment."

☐ **2. APPENDIX V DRUMS:**
This notification and certification applies to the following drums on this shipment: (list the drum identification number(s)):

"I certify under penalty of law to support this certification I have personally examined and am familiar with the waste through analysis and testing or through knowledge of the waste, and that the lab pack contains only those constituents specified in Appendix V to part 268. I am aware that there are significant penalties for submitting a false certification, including the possibility of fine and imprisonment."

3. ALL DRUMS THAT ARE NOT PACKED AS APPENDIX IV OR APPENDIX V:
Check and complete A, B, and/or C; as applicable. Note: the same drum may appear in more than one section below, if applicable.

☒ **A. REQUIRES TREATMENT:** The wastes in the following drums require treatment to the standards that corresponds to the USEPA hazardous waste numbers, category (wastewater/nonwastewater) and subcategories described on the corresponding Drum Inventory sheets (attached).
This notification and certification applies to those wastes (see form B) in the following drums on this shipment: (list the drum identification number(s)):
SIM-1, 2

☐ **B. NATURALLY MEETS THE TREATMENT STANDARD:** The wastes in the following drums naturally meet the treatment standard(s) that correspond to the USEPA hazardous waste numbers, category (wastewater/nonwastewater) and subcategories described on the corresponding Drum Inventory sheets (attached).
This notification and certification applies to those wastes (see the Drum Inventory) in the following drums on this shipment: (list the drum identification number(s)):

"I certify under penalty of law that I have personally examined and am familiar with the waste through analysis and testing or through knowledge of the waste to support this certification that the waste complies with the treatment standards specified in 40 CFR Part 268 Subpart D and all applicable prohibitions set forth in 40 CFR 268.32 or RCRA Section 3004(d). I believe that the information I submitted is true, accurate and complete. I am aware that there are significant penalties for submitting a false certification, including the possibility of fine and imprisonment."

☐ **C. SUBJECT TO A VARIANCE:** Some or all of the wastes in the following drums are subject to a national capacity variance, a treatability varaince, or a case-by-case extension. The date of expiration for many wastes is printed on the reverse side of the drum inventory form. For all other wastes, the expiration date must be written on the drum inventory form in the VARIANCE column.
This notification applies to those wastes identified (see the Drum Inventory sheets) in the following drums on this shipment: (list the drum identification number(s)):

In addition to an applicable certification above, I hereby certify that all information submitted in this and all associated documents is complete and accurate to the best of my knowledge and information.

Signature: [redacted] Title: General Assistant, HWM, SIUE Date: 2/17/[redacted]

LAB PACK CERTIFICATION FORM—REVERSE SIDE
SOLVENT AND CALIFORNIA LIST TREATMENT STANDARDS

*If the waste identified on the other side of this form is described by any of the following US EPA hazardous waste codes: F001, F002, F003, F004, F005, and/or this hazardous waste is subject to any prohibitions identified as California List restrictions (40 CFR 268.32 and/or RCRA Section 3004(d)), then this page MUST accompany the shipment, along with the opposite side of this form. If the waste code F039 describes this waste, then the corresponding treatment standards must be attached.

SOLVENT WASTE TREATMENT STANDARDS

F001 through F005 spent solvent constituents and their associated USEPA hazardous waste code(s)	Treatment Standard*		F001 through F005 spent solvent constituents and their associated USEPA hazardous waste code(s)	Treatment Standard*	
	Wastewaters	Nonwastewaters		Wastewaters	Nonwastewaters
Acetone (F003)	0.05	0.59	Methylene chloride (F001, F002)	0.20	0.96
Benzene (F005)	40 CFR 268.43 - 0.07	40 CFR 268.43 - 3.7	Methylene chloride from pharmaceutical production (F001, F002, F003, F004, F005)	40 CFR 268.43 - 0.44	0.96
n-Butyl alcohol (F003)	5.0	5.0	Methyl ethyl ketone (F005)	0.05	0.75
Carbon disulfide (F005)	1.05	4.81	Methyl isobutyl ketone (F003)	0.05	~~0.33~~ 0.75
Carbon tetrachloride (F001)	0.05	0.96	Nitrobenzene (F004)	0.66	0.125
Chlorobenzene (F002)	0.15	0.05	2-Nitropropane (F005)	40 CFR 268.42 - [IWETOX or CHOXD] followed by CARBN] or INCIN	40 CFR 268.42 - INCIN
Cresols (and cresylic acid) (F004)	2.82	0.75	Pyridine (F005)	1.12	0.33
Cyclohexanone (F003)	0.125	0.75	Tetrachloroethylene (F001, F002)	0.079	0.05
1,2-Dichlorobenzene (F002)	0.65	0.125	Toluene (F005)	1.12	0.33
2-Ethoxyethanol (F005) (also called ethylene glycol monoethyl ether)	40 CFR 268.42 - INCIN or BIODG	40 CFR 268.42 - INCIN	1,1,1-Trichloroethane (F001, F002)	1.05	0.41
Ethyl acetate (F003)	0.05	0.75	1,1,2-Trichloroethane (F002)	40 CFR 268.43 0.05	40 CFR 268.43 0.96
Ethylbenzene (F005)	0.05	0.053	1,1,2-Trichloro-1,2,2-trifluoroethane (F002)	1.05	0.96
Ethyl ether (F003)	0.05	0.75	Trichloroethylene (F001, F002)	0.062	0.091
Isobutanol (F005)	5.0	5.0	Trichlorofluoromethane (F002)	0.05	0.96
Methanol (F003)	0.25	0.75	Xylene (F005)	0.05	0.15

*All spent solvent treatment standards are taken from 40 CFR Part 268.41, unless otherwise noted. Wastewater units are mg/l, nonwastewater are mg/kg

CALIFORNIA LIST TREATMENT STANDARDS - 40 CFR 268.32, 40 CFR 268.42 and RCRA Section 3004(d)

A waste must first be designated as a U.S. EPA Hazardous waste before the waste can be subject to the California List restrictions

Restricted waste description	Prohibition	Treatment Standard
Liquid or nonliquid wastes containing Halogenated Organic Compounds listed in 40 CFR 268, Appendix III	Liquid wastes: Greater than or equal to 1,000 mg/l Nonliquid wastes: Greater than or equal to 1,000 mg/kg	40 CFR 268.42(a)(2) - INCIN
Liquid* wastes containing Poly Chlorinated Biphenyls (PCBs)	Greater than or equal to 50 ppm	40 CFR 268.42(a)(1) - INCIN or FSUBS Also see 40 CFR 761.60 and 761.70
Liquid* wastes containing Cyanides	Free (amenable to chlorination) cyanides at concentrations greater than or equal to 1,000 mg/l	RCRA Section 3004(d)
Liquid* wastes containing Metals	One or more of the following metals (or elements) at concentrations greater than or equal to the following: Arsenic and/or compounds as As: 500 mg/l Cadmium and/or compounds as Cd: 100 mg/l Chromium and/or compounds as Cr: 500 mg/l Lead and/or compounds as Pb: 500 mg/l Mercury and/or compounds as Hg: 20 mg/l Nickel and/or compounds as Ni: 134 mg/l Selenium and/or compounds as Se: 100 mg/l Thallium and/or compounds as Tl: 130 mg/l	RCRA Section 3004(d)
Liquid* Acid wastes	pH is less than or equal to 2.0	RCRA Section 3004(d) and 40 CFR 268.42(a)

* - For the definition of "liquid" refer to Method 9095, the Paint Filter Liquids Test from EPA manual SW-846

DEC 2 8 1994

HRE-8J

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. David E. McDonald
Coordinator for Environmental Health & Safety
Southern Illinois University at Edwardsville
P.O. Box 1657
Edwardsville, Illinois 62026

Re: Notice of Violation
Southern Illinois University Edwardsville
ILD 006 331 342

Dear Mr. McDonald:

This is in response to your letter dated August 10, 1994, regarding an Compliance Evaluation Inspection conducted by representatives of the United States Environmental Protection Agency at the above-referenced facility on November 18, 1993. After conferring with the State, it was determined that Southern Illinois University at Edwardsville (SIUE) is no longer a treatment, storage, or disposal (TSD) facility. It has also been determined that SIUE is a Small Quantity Generator of hazardous waste. However, in reference to a letter dated February 4, 1993, from the Illinois Environmental Protection Agency, SIUE is still required to comply with the requirements of 35 Ill. Adm. Code Parts 722 and 728.

In a Notice of Violation letter dated June 22, 1994, from the United States Environmental Protection Agency, to SIUE, five violations were cited. Violations #1, #2, and #3, are no longer applicable now that SIUE is no longer a TSD. However, violations #4 and #5 remain outstanding. These violations are listed below:

- Failure to make arrangements with local authorities, as required by 35 Ill. Adm. Code 725.137/722.134(d)(4). No arrangements were made with the police department, fire department, emergency response teams, local hospitals, etc; and,

- Failure to submit a land ban notification with the manifest, as required by 35 Ill. Adm. Code 728.107(a)(1). Land Ban Notifications were not included with RCRA shipping manifests numbers INA 0893727 and IL 4652829. Manifest number IL 493920 had a land ban notification but the notification was not signed or dated.

Additionally, the inspector indicated in the inspection report that your record keeping was poor. It was difficult for the inspector to locate the RCRA, shipping manifests to confirm the 35 Ill. Adm Code 722.142 - Exception Report requirement. Although this was not identified as an apparent violation, we encourage you to have your records available for the inspector's review.

Please submit to this office within thirty (30) days of receipt of this Notice of Violation letter, documentation demonstrating that the above-cited violations have been corrected and indicating what measures have been initiated to assure future compliance. Failure to correct the violations may subject the facility to further Federal enforcement action.

If you have any questions regarding this correspondence, please contact Ms. Barbara Russell of my staff at (312) 353-7922.

Sincerely yours,

Paul E. Dimock, Chief
Enforcement Program Section

cc: William Radlinski, IEPA
Glenn Savage, IEPA

bcc: File

B.RUSSELL:pw:12/06/94:DISK #:FILENAME: SIUELETR

CONCURRENCE REQUESTED FROM REB			
SEC/BR SECRTRY	12/22/94		
OTHER STAFF	REB STAFF	REB SECTION CHIEF	REB BRANCH CHIEF
	BR 12/20/94	PED 12-27-94	

Southern Illinois University at Edwardsville
Environmental Health and Safety
Box 1657
Edwardsville, Illinois 62026

August 10, 1994

United States Environmental Protection Agency
Attention: HRE-8J
Region 5
77 West Jackson Boulevard
Chicago, IL 60604-3590

Subject: Notice of Violation
Southern Illinois University at Edwardsville
Edwardsville, Illinois
ILD 006 331 342

Subsequent to the inspection of November 18, 1993, and another Notice of Violation dated November 22, 1993, I submitted a response to the Environmental Protection Agency (EPA). My understanding was that the EPA's response to that letter (attached) also addressed both the NOV of November 22 and the RCRA inspection of November 18, 1993. In addition, it was my understanding that the letter resolved both matters. Please let me know if my understanding is incorrect.

Should you have any additional questions concerning this matter please call me at extension (618) 692-3584.

Sincerely,

David McDonald
Coordinator for Environmental Health and Safety

JUN 22 1994

HRE-8J

Mr. David E. McDonald
Coordinator for Environmental Control
Southern Illinois University
P.O. Box 1652
Edwardsville, Illinois 62026

Re: Notice of Violation
Southern Illinois University
Edwardsville, Illinois
ILD 006 331 342

Dear Mr. McDonald:

On November 18, 1993, a RCRA inspection of the above-referenced facility was conducted by a representative of the United States Environmental Protection Agency (U.S. EPA) and a representative of the Illinois Environmental Protection Agency (IEPA) under Section 3007 of the Resource Conservation and Recovery Act (RCRA), U.S. EPA has granted the primary responsibility for ensuring the compliance of State facilities under its jurisdiction.

The purpose of the inspection was to determine if your facility was in compliance with the State equivalent requirements of Subtitle C of the Resource Conservation and Recovery Act (RCRA) as amended, 42 U.S.C. §6901 et seq.

With respect to the inspection, the Southern Illinois University was found to be in violation of the RCRA requirements. A copy of the inspection report is enclosed for your information. The following violations have been identified:

1. Failed to conduct personnel training, as required by 35 Ill. Adm. Code 725.116. The teaching assistants, researchers, graduate students and faculty were not trained in hazardous waste management.

2. Failed to adequately comply with the purpose and implementation of a contingency plan, as required by 35 Ill. Adm. Code 725.151. The owner or operator must have a contingency plan for his facility. At the time of the inspection, a draft contingency plan was available for review.

3. Failed to conduct weekly inspections, as required by 35 Ill. Adm. Code 725.274. Weekly inspections were not conducted of the former storage areas until IEPA approved the closure and certification.

4. Failed to make arrangements with local authorities, as required by 35 Ill. Adm. Code 725.137. No arrangements were made with the police department, fire department, emergency response teams, local hospitals, etc.

5. Failed to submit a land ban notification with the manifest, as required by 35 Ill. Adm. Code 728.107(a)(1). Land ban notifications were not included with RCRA shipping manifests numbers INA 0893727 and IL 4652829. Manifest number IL 4939230 had a land ban notification but the notification was not signed or dated.

Additionally, the inspector indicated in the inspection report that your record keeping was poor. It was difficult for the inspector to locate the RCRA, shipping manifests to confirm the 35 Ill. Adm. Code 722.142 - Exception Report requirement. Although this was not identified as an apparent violation, we encourage you to have your records available for the inspector's review.

Please submit to this office within thirty (30) days of receipt of this notice of violation, documentation demonstrating that the above-cited violations have been corrected and indicating what measures have initiated to assure future compliance. Failure to correct the violations may subject the facility to further Federal enforcement action.

If you have any questions regarding this correspondence, please contact Ms. Zetta Thomas of my staff at (312) 886-4581.

Sincerely yours,

Paul E. Dimock, Chief
IL/MI/WI Enforcement Program Section

Enclosure

cc: William Radlinski, IPEA
Glenn Savage, IEPA

bcc: P. Dimock
Z. Thomas
Z.THOMAS:ev:06/15/94:DISK #:FILENAME:david

SIGNATURE/INITIAL CONCURRENCE REQUESTED - RCRA ENFORCEMENT BRANCH (REB)								
SC/BR/OFC SECRETARY	6/16/94							
INITIATOR /AUTHOR	IL/IN TES CHIEF	MI/WI TES CHIEF	MN/OH TES CHIEF	IL/MI/WI EPS CHIEF	IN/MN/OH EPS CHIEF	REB BRANCH CHIEF	RCRA ASSOC. DIR.	WMD DIVISION DIRECTOR
6/16/94				6-21-94				

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

MAY 09 1994

REPLY TO THE ATTENTION OF:

MEMORANDUM

SUBJECT: RCRA Compliance Inspection at Southern Illinois University at Edwardsville, Illinois (ILD006331342) (AGD102:03)

FROM: Gerald R. Golubski, Environmental Engineer
Central District Office (SC-10C)

TO: Joseph M. Boyle, Chief
RCRA Enforcement Branch (HRE-8J)

THRU: Valerie J. Jones, Chief
Central District Office (SC-10C)

On November 18, 1993, a RCRA inspection was conducted at this State Owned and Operated University. This inspection was pursuant to your office's request for inspections during FY'94. The University was represented by Mr. David E. McDonald, Coordinator for Environmental Control. The Illinois EPA was represented by Mr. Chris Cahnovsky, Environmental Protection Specialist from the Collinsville Area Office.

Background

Most wastes generated on campus occurs within the Science Building. Typical wastes include spent acids with metals (D004-D007, D009), Acidic and Basic Liquid Wastes (D002), Waste Flammable Liquids such as Acetone (F003), and Methylene Chloride (F002), Lab packs containing a variety of waste flammables and corrosives and waste poison B's. In addition the physical plant building generated 8 gallons of Lead Base Paint (D008) last year.

In the past, all wastes generated within the science building was either delivered downstairs for temporary storage or treated in Room 1209. However, at the time of this inspection the treatment lab (Room 1209) and TSD storage room (SL0308) was undergoing closure. The walls, floors, and counters had been washed thoroughly in each room. The rinsate was collected and analyzed. The results are now under review by the Illinois EPA.

According to Mr. McDonald, once closure has been approved, the University will operate only as a small quantity RCRA generator. They will store RCRA regulated wastes for less than 90 days.

Science Building Inspection

At the time of the U.S. EPA inspection, numerous class rooms and laboratories were examined for RCRA regulated wastes. The results of that inspection were as follows.

Room 1209 (Former Treatment Lab)

As previously stated this Lab is currently undergoing RCRA closure. As observed by this inspector, the floors, counters, and fume hoods were

thoroughly cleaned. The University now awaits approval from the Illinois EPA in granting closure.

Room 2218 Physical Chemistry Lab

No wastes were located inside this room.

Room 2217 General Chemistry Lab

Seven containers (1 gallon each) of wastes were located inside this room. Each container was labeled, dated and stored close.

Room 2216 Organic Chemistry Lab

No wastes were located inside this room.

Room 2212 Organic Chemistry Lab

Six containers (1 gallon each) was located inside this room. Each container was labeled, had storage dates and were stored close.

Room 2210 Biochemistry Research Lab

Six containers (1 gallon each) was located inside this room. Each container was labeled, dated and stored close.

Room 2209 Organic & Inorganic Research

Six containers (1 gallon each) was located inside this room. Each container was labeled, dated and stored close.

Physical Plant Building

No RCRA regulated wastes were stored at this location during this inspection. However, waste oils were located on an outside shipping dock. According to plant personnel, the used oil is returned to a recycler. A small fee is paid by the University for each 55 gallon drum of oil generated.

In the past the physical plant generated waste oil base paints and solvents; however, with the use of latex wall paints, the physical plant no longer generated these wastes. While interviewing automotive repair personnel they declared that they no longer generate any hazardous wastes. The also stated that automobile batteries are typically returned (with the acid) to a vendor for a credit when purchasing new batteries.

1992 Annual Report

The University's latest annual report is attached to this narrative. Essentially approximately 900 gallons (by volume) of RCRA regulated wastes were shipped offsite for disposal. The majority of the wastes consisted of waste acids containing metals (160 gallons), waste liquid acids and bases (200 gallons), waste flammable liquids (220 gallons) and waste solids containing mercury (220 gallons). In addition several Lab packs were also prepared and shipped offsite for disposal (150 gallons).

It appears that with the introduction of micro-analytical experiments in the teaching lab and with the University's efforts in recycling used chemicals (see attached notice from Environmental Health & Safety Department), the University may in the future be regulated as a small quantity RCRA generator.

Contingency Plan

At the time of this RCRA inspection the University had not officially implemented their RCRA Contingency Plan. Thus, it appears that they are deficient in Title 35 Section 725.137 at this time. Essentially, their draft plan needs to be updated. Moreover, the emergency coordinator needs to be identified and the plan needs to be distributed campus wide.

RCRA Training

Although, Mr. McDonald, Environmental Coordinator had RCRA Training in 1992, the University does not provide formal training to personnel who manage RCRA regulated wastes i.e. teaching assistants, researchers, and faculty. This deficiencies was also noted during a U.S. EPA inspection on January 22, 1993. Thus it appears that the University was deficient in not providing RCRA Training as per Title 35 Section 725.116.

Shipping Manifests

Upon examining RCRA shipping manifests at the University, several deficiencies were noted. Specifically they were as follows:

Shipping Manifest #	Explanation
1. INA 0893727	No Land Ban notification was attached.
2. IL 4652829	No Land Ban notification was attached.
3. IL 4939230	Had Land Ban notification; however, it was neither signed or dated.

Thus, it appears that the University was deficient in providing Land Ban notification sheets as per Title 35 Section 728.107(a)(b).

In addition, it appears that the University's RCRA shipping manifest tracking system needs to be improved. After examining several files it was apparent that the entire set of RCRA shipping manifests needs to be better organized and tracked accordingly. Currently, it would be very difficult for University employees to track any RCRA shipments with this current manifest filing system.

Operating Record

The University's operating record of managing waste on campus is tracked by a computer. Each waste received by the Environmental Health & Safety is accompanied by a completed Hazardous Waste Disposal Request form. A copy of the current inventory of chemical wastes located on campus is attached to this report. The University offers these chemicals for reuse on a campus wide basis (see attachment).

Attached is a completed Illinois EPA RCRA inspection checklist and Land Ban inspection checklist.

If you should have any questions regarding this inspection, please call me at 886-1968.

Attachments

Nov. 1993

Hazardous Waste Inventory

Chemical/Product Name	Quantity
Photo Line Fixer	5.0 gal
Photo Developer	2*5.0 gal
Photo Developer	5.0 gal
Photo Developer	2.5 gal
Photo Fixer	5.0 gal
Photo FIxer	2.5 gal
Photo Stop Bath	5.0 gal
Photo Line Developer	5.0 gal
Ink	55 gal-drum
Developer & Fixer (Mixer)	3*5.0 gal
Aluminum Sulfide	200 g
Ammonium Acetate	1 lb
Ammonium Fluoride	2*1 lb
Ammonium Thiosulfate	1 lb
Antimony Trisulfide	1 lb
Aquopentammino Cobaltic Chloride	50 g
Ascarite	7*1 lb
Calcium Hydride	100 g
Calcium Hydrochlorite	226 g
Magnesium Perchlorate	226 g
Oxsorbent	100 ml
Potassium Ferric Oxalate	200 g
Potassium Fluoride	5 lbs
Potassium Nitrite	550 g
Potassium Trifluorostannite	124 g
Selenic Acid	1 lb
Selenous Acid	4 oz
Silver Nitrate	200 ml
Sodium Arsenate	1 lb
Sodium Fluoride	1 lb
Sodium Nitroprusside	3 lbs
Sodium Oxide	100 g
Sodium Sulphhydrate	2 lbs
Sodium Sulfide	500 g
Stannous Chloride	1 lb
Stibnite Ore	200 g
Thio Acetamide	100 g
Blankrola Solvent	2*5 gal
Phenol/Chloroform Waste	5.5 L
Photo Developer	2.5 gal
Photo Developer	2.5 gal
Photo Developer	2.5 gal
Photo Fixer	5 gal
Photo Stop Bath	5 gal
Photo Developer	5 gal
Photo Fixer	2.5 gal

SIUE Southern Illinois University at Edwardsville

Environmental Health and Safety

FILE COPY

Dear Sir or Ms.

Find enclosed a copy of our Chemical Recycling List for the third quarter of 1993. These chemicals are available on a first come - first serve basis and will be available, unless claimed, until the fourth quarter list appears.

If you would like to obtain any of these chemicals, be removed from our mailing list or inquire regarding a chemical not appearing on the current list please contact me at your earliest opportunity.

SIU-E's Environmental Health and Safety Department may be able to deliver chemicals to you if possible within the constraints of time and distance. I may be reached Monday through Friday, 8:00 to 4:30 at (618) 692-3592 or at:

SIU-E Environmental Health and Safety
Box 1657
Edwardsville, Il 62026

Thank you for your time and attention, I look forward to hearing from you.

Sincerely,

Thomas E. Schnitzius

Hazardous Waste Technician

Building-Room		Trade Name	Manufacturer	MSDS #	Haz & Sto Class		Ave Quant	Max Quant
[redacted]	9/93	Alum	N/A	999999	J	5	6 oz	6 oz
SB	9/93	Alumina	N/A	999999	J	5	2 lbs	2 lbs
~~SB~~	~~9/93~~	~~Aluminum Chloride~~	~~N/A~~	~~999999~~	~~D~~	~~1~~	~~8 oz~~	~~8 oz~~
SB	9/93	Aluminum iso-Propoxide	N/A	999999	E	2	3 kg	3 kg
SB	9/93	Aluminum Potassium Sulfate	N/A	999999	J	1	5 lbs	10 lbs
SB	9/93	Aluminum Potassium Sulfate	N/A	999999	J	5	1 lb	13 lbs
SB	9/93	Aluminum Potassium Sulfate	N/A	999999	J	5	100 g	100 g
SB	9/93	Aluminum Stearate	N/A	999999	J	5	1 lb	1 lb
SB	9/93	Aluminum Sulfite Crystals	N/A	999999	D	1	226 g	226 g
SB	9/93	Ammonium Chromate	N/A	999999	D	1	1 lb	3 lbs
SB	9/93	Ammonium Dichromate	N/A	999999	D	1	5 lbs	10 lbs
SB	9/93	Ammonium m-Tungstenate	N/A	999999	D	1	200 g	200 g
~~SB~~	~~9/93~~	~~Barium Chloride~~	~~N/A~~	~~999999~~	~~G~~	~~3~~	~~4 lbs~~	~~4 lbs~~
~~SB~~	~~9/93~~	~~Barium Chromate~~	~~N/A~~	~~999999~~	~~G~~	~~3~~	~~2 lbs~~	~~2 lbs~~
~~SB~~	~~9/93~~	~~Barium Hydroxide~~	~~N/A~~	~~999999~~	~~D~~	~~1~~	~~2 lbs~~	~~4 lbs~~
~~SB~~	~~9/93~~	~~Calcium Hydroxide~~	~~N/A~~	~~999999~~	~~D~~	~~1~~	~~1 lb~~	~~1 lb~~
~~SB~~	~~9/93~~	~~Calcium Oxide (Quicklime)~~	~~N/A~~	~~999999~~	~~I~~	~~4~~	~~5 lbs~~	~~5 lbs~~
~~SB~~	~~9/93~~	~~Calcium Phosphate~~	~~N/A~~	~~999999~~	~~J~~	~~5~~	~~1 lb~~	~~1 lb~~
SB	9/93	Calcium Salicylate	N/A	999999	J	5	1 lb	1 lb
SB	9/93	Chromic Potassium Oxalate	N/A	999999	G	3	20 g	20 g
~~SB~~	~~9/93~~	~~Copper Dust~~	~~N/A~~	~~999999~~	~~J~~	~~5~~	~~150 g~~	~~150 g~~
~~SB~~	~~9/93~~	~~Copper Granules~~	~~N/A~~	~~999999~~	~~J~~	~~5~~	~~226 g~~	~~226 g~~
SB	9/93	Iron Metal (Card Teeth)	N/A	999999	J	5	1 lb	1 lb
SB	9/93	Lanthanum Oxide	N/A	999999	J	5	1 oz	1 oz
~~SB~~	~~9/93~~	~~Lead Oxide~~	~~N/A~~	~~999999~~	~~G~~	~~3~~	~~25 lbs~~	~~25 lbs~~
~~SB~~	~~9/93~~	~~Lead Sulfide~~	~~N/A~~	~~999999~~	~~G~~	~~3~~	~~5 lbs~~	~~5 lbs~~
SB	9/93	Lead Thiocyanate	N/A	999999	G	3	100 g	100 g
~~SB~~	~~9/93~~	~~Magnesium Carbonate~~	~~N/A~~	~~999999~~	~~J~~	~~5~~	~~3 lbs~~	~~6 lbs~~
~~SB~~	~~9/93~~	~~Magnesium Sulfate~~	~~N/A~~	~~999999~~	~~J~~	~~5~~	~~300 g~~	~~300 g~~
~~SB~~	~~9/93~~	~~Manganese Carbonate~~	~~N/A~~	~~999999~~	~~J~~	~~5~~	~~1 lb~~	~~1 lb~~
SB	9/93	Nickel Ammonium Sulfate	N/A	999999	G	3	1 lb	1 lb
SB	9/93	Octanol	N/A	999999	E	2	100 ml	100 ml
~~SB~~	~~9/93~~	~~Potassium Bicarbonate~~	~~N/A~~	~~999999~~	~~J~~	~~5~~	~~1 lb~~	~~3 lbs~~
SB	9/93	Potassium Carbonate	N/A	999999	J	5	125 g	125 g
~~SB~~	~~9/93~~	~~Potassium Phosphate~~	~~N/A~~	~~999999~~	~~J~~	~~5~~	~~300 g~~	~~300 g~~
SB	9/93	Potassium Silicate	N/A	999999	K	5	500 g	500 g
SB	9/93	Selenium Granules	N/A	999999	G	3	100 g	100 g
SB	9/93	Selenium Metal (sticks)	N/A	999999	G	3	3 lbs	3 lbs
~~SB~~	~~9/93~~	~~Silicon Metal~~	~~N/A~~	~~999999~~	~~J~~	~~5~~	~~500 g~~	~~500 g~~
SB	9/93	Soda Lime	N/A	999999	D	1	3 lbs	3 lbs
~~SB~~	~~9/93~~	~~Sodium Bismuthate~~	~~N/A~~	~~999999~~	~~F~~	~~1~~	~~1 lb~~	~~4 lbs~~
~~SB~~	~~9/93~~	~~Sodium Bisulfate~~	~~N/A~~	~~999999~~	~~D~~	~~1~~	~~5 lbs~~	~~5 lbs~~
SB	9/93	Sodium Lauryl Sulfate	N/A	999999	J	5	3 lbs	3 lbs
SB	9/93	Sodium m-Silicate (crystals)	N/A	999999	K	5	5 lbs	5 lbs
SB	9/93	Sodium Stearate	N/A	999999	J	5	226 g	226 g
~~SB~~	~~9/93~~	~~Sodium Thiocyanate~~	~~N/A~~	~~999999~~	~~G~~	~~3~~	~~5 lbs~~	~~5 lbs~~
SB	9/93	Sodium Tungstate	N/A	999999	K	5	1 lb	2 lbs
~~SB~~	~~9/93~~	~~Stannous Sulfide~~	~~N/A~~	~~999999~~	~~D~~	~~1~~	~~2 lbs~~	~~2 lbs~~
SB	9/93	Woods Metal	N/A	999999	J	5	226 g	226 g
~~SB~~	~~9/93~~	~~Zinc Dust~~	~~N/A~~	~~999999~~	~~E~~	~~2,4~~	~~150 g~~	~~150 g~~
[redacted]	9/93	Zinc Oxide	N/A	999999	J	5	5 lbs	5 lbs
[redacted]	9/93	Zinc Oxide (reagent grade)	N/A	999999	J	5	1 lb	1 lb

HAZARDOUS MATERIALS INVENTORY LIST FOR SIU-E RECYCLING

-Building-Room		Trade Name	Manufacturer	MSDS #	Haz & Sto Class		Ave Quant	Max Quant
~~SB~~	~~9/93~~	~~Zinc Sulfide (purified)~~	~~N/A~~	~~999999~~	~~J~~	~~5~~	~~1 lb~~	~~3 lbs~~
~~SB~~	~~9/93~~	~~Zinc Sulfide (reagent powder)~~	~~N/A~~	~~999999~~	~~J~~	~~5~~	~~1 lb~~	~~1 lb~~
SB	9/93	Zirconium Oxide (purified)	N/A	999999	K	5	1 lb	1 lb
SB	9/93	Zirconyl Nitrate	N/A	999999	D,F	1,4	1 lb	3 lbs

Number of Hazardous Materials listed for SIU-E RECYCLING = 56

HAZARD CLASSES

				STORAGE CLASSES	
A - Biohazard	D - Corrosive	G - Poison	J - Non-hazard	1 - Contact	4 - Reactive
B - Carcinogen	E - Flammable	H - Radioactive	K - Not Classified	2 - Flammable	5 - Not Classified
C - Compressed Gas	F - Oxidizer	I - Water Reactive		3 - Health	

Southern Illinois University at Edwardsville
Hazardous Waste Management

April 6, 1993

Facility Reporting Unit
Illinois Environmental Protection Agency
Bureau of Land
Post Office Box 19276
Springfield, Illinois 62794-9276

Dear Sir/Madam:

RE: Generator/Facility USEPA # ILD006331342

Due to the extensive number of corrections and comments it was necessary to retype the annual report. I have enclosed our original submission for comparison purposes. Should you have any questions concerning our revised report, please let me know.

Sincerely,

David E. McDonald
Coordinator for Environmental Control

enclosure

SOUTHERN ILLINOIS UNIVERSITY
SCIENCE BUILDING
EDWARDSVILLE IL 62026

ILLINOIS Environmental Protection Agency
1992 Hazardous Waste Report
Form GM – Waste Generation and Managemen

Instructions for this form found on pages 13 - 30.

Sec. I WASTE DESCRIPTION

A. Waste Description: Spent Acids with Metals

B. EPA Hazardous Waste Code D004 (30) D005 (34) D006 (38) D007 (42) D009 (46)

C. SIC code 8221 (50)

D. Origin Code 1 (64) System type M (55)

E. Source code A94 (59) A (62) A (66)

F. Point of measurement 1 (68)

G. Waste form code B103 (69)

H. Radioactive mixed 2 (73)

I. TRI constituent 1 (74)

J. CAS numbers: 1. (75) 2. (85) 3. (91)
4. (98) 5. (107)

Sec. II QUANTITY GENERATED AND MANAGED ON-SITE

A. UOM 1 (115) Density 10.0 (116) lbs/gal *(Same unit and density must be used for all quantities on this page)*

Quantity generated in : B Previous reporting year (125) 3290. C. Current reporting year (130) 160.

D. Did this location do any of the following to this waste (at this location): manage in exempt or regulated treatment, recycling, or disposal process? Y (140) Y= Yes (Continue to System 1) N= No (Skip to Sec. III)

On-Site System 1: System Type M (141) 079 Quantity managed on-site this year (145) 1600

On-Site System 2: System Type M (155) Quantity managed on-site this year (159)

Sec. III OFF-SITE SHIPMENT

A. Was any of this waste shipped off site this reporting year? N (169) Y= Yes (Continue to Box B) N= No (Skip to Sec. IV)

Site 1: Name and address of facility:

B. U.S. EPA ID No. of facility waste was shipped to: (170)

C. System type shipped to M (182) D. Off-site availability code (186)

E. Total quantity shipped in this reporting year: (187)

Site 2: Name and address of facility:

B. U.S. EPA ID No. of facility waste was shipped to: (197)

C. System type shipped to M (209) D. Off-site availability code (213)

E. Total quantity shipped in this reporting year: (214)

Sec. IV NEW WASTE MINIMIZATION ACTIVITIES

A. Did new activities in this year result in minimization of this waste? N (224) Y= Yes (Cont. to Box B) N= No (Cont. to Sec. V)

B. Activity W (226) W (228) W (231) W (234) C. Other effects (Y=Yes, N=No) (237)

D. Quantity recycled in reporting year due to new activities (238)

E. Activity/production index (248) F. Reporting year Source reduction quantity (251)

Sec. V REGULATED STORAGE

A. Did this site store RCRA wastes 90 days or more and then ship it off-site (to site shown in Section III)? (Y=Yes, N=No) N (261)

B. Did this site store RCRA wastes on-site for more than 90 days but waste is in storage at year end: (Y= Yes, N= No) N (262)

Quantity stored at year end and for 90 days or more that was generated this reporting year: (263)

Quantity stored at year end that was generated prior to this reporting year: (273)

COMMENTS: Y (292) Enter Y (Yes) if you have comments regarding this page and attach extra sheet.

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Instructions for this form found on pages 13 - 30.

Sec. I WASTE DESCRIPTION

A. Waste Description: Acidic and Basic Liquid Waste

B. EPA Hazardous Waste Code D002 (30) (34) (38) (42) (46)

C. SIC code 8221 (50)

D. Origin Code 1 (54) System type M (55)

E. Source code A04 (59) A (62) A (66)

F. Point of measurement 1 (68)

G. Waste form code B105 (69)

H. Radioactive mixed 2 (73)

I. TRI constituent 1 (74)

J. CAS numbers: 1. (75) 2. (83) 3. (91)
4. (99) 5. (107)

Sec. II QUANTITY GENERATED AND MANAGED ON-SITE

A. UOM 1 (115) Density 10.0 (116) lbs/gal *(Same unit and density must be used for all quantities on this page)*

Quantity generated in : B Previous reporting year 3200.0 (120). C. Current reporting year 2000.0 (130)

D. Did this location do any of the following to this waste (at this location): manage in exempt or regulated treatment, recycling, or disposal process? Y (140) Y= Yes (Continue to System 1) N= No (Skip to Sec. III)

On-Site System 1: System Type M (141) 121 Quantity managed on-site this year 2000.0 (145)

On-Site System 2: System Type M (155) Quantity managed on-site this year (159)

Sec. III OFF-SITE SHIPMENT

A. Was any of this waste shipped off site this reporting year? N (169) Y= Yes (Continue to Box B) N= No (Skip to Sec. IV)

Site 1: Name and address of facility:

B. U.S. EPA ID No. of facility waste was shipped to: (170)

C. System type shipped to M (182) D. Off-site availability code (186)

E. Total quantity shipped in this reporting year: (187)

Site 2: Name and address of facility:

B. U.S. EPA ID No. of facility waste was shipped to: (197)

C. System type shipped to M (209) D. Off-site availability code (213)

E. Total quantity shipped in this reporting year: (214)

Sec. IV NEW WASTE MINIMIZATION ACTIVITIES

A. Did new activities in this year result in minimization of this waste? N (224) Y= Yes (Cont. to Box B) N= No (Cont. to Sec. V)

B. Activity W (226) W (228) W (231) W (234) C. Other effects (Y=Yes, N=No) (237)

D. Quantity recycled in reporting year due to new activities (238)

E. Activity/production index (248) F. Reporting year Source reduction quantity (251)

Sec. V REGULATED STORAGE

A. Did this site store RCRA wastes 90 days or more and then ship it off-site (to site shown in Section III)? (Y=Yes, N=No) N (261)

B. Did this site store RCRA wastes on-site for more than 90 days but waste is in storage at year end: (Y= Yes, N= No) N (262)

Quantity stored at year end and for 90 days or more that was generated this reporting year: (263)

Quantity stored at year end that was generated prior to this reporting year: (273)

COMMENTS: N (289) Enter Y (Yes) if you have comments regarding this page and attach extra sheet.

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Instructions for this form found on pages 13 - 30.

Sec. I WASTE DESCRIPTION

A. Waste Description: Waste flammable liquid; Acetone

B. EPA Hazardous Waste Code (30) F 0 0 3 (34) (38) (42) (46)

C. SIC code (50) 8 2 2 1

D. Origin Code (54) 1 System type (55) M

E. Source code (59) A 9 4 (62) A (66) A

F. Point of measurement (69) 1

G. Waste form code (70) B 2 0 3

H. Radioactive mixed (73) 2

I. TRI constituent (74) 1

J. CAS numbers: 1. (76) 2. (88) 3. (91)

4. (98) 5. (107)

Sec. II QUANTITY GENERATED AND MANAGED ON-SITE

A. UOM (115) 1 Density (116) 8.30 lbs/gal *(Same unit and density must be used for all quantities on this page)*

Quantity generated in : B Previous reporting year (125) 165.0 C. Current reporting year (135) 110.0

D. Did this location do any of the following to this waste (at this location): manage in exempt or regulated treatment, recycling, or disposal process? (140) N Y= Yes (Continue to System 1) N= No (Skip to Sec. III)

On-Site System 1: System Type (141) M Quantity managed on-site this year (145)

On-Site System 2: System Type (156) M Quantity managed on-site this year (160)

Sec. III OFF-SITE SHIPMENT

A. Was any of this waste shipped off site this reporting year? (167) Y Y= Yes (Continue to Box B) N= No (Skip to Sec. IV)

Site 1: Name and address of facility: Industrial Fuel and Resources
604 South Scott St
South Bend IN 46625

B. U.S. EPA ID No. of facility waste was shipped to: (170) I N D 9 8 0 5 9 0 9 4 7

C. System type shipped to (182) M 0 5 9 D. Off-site availability code (186) 1

E. Total quantity shipped in this reporting year: (187) 110.0

Site 2: Name and address of facility:

B. U.S. EPA ID No. of facility waste was shipped to: (197)

C. System type shipped to (209) M D. Off-site availability code (213)

E. Total quantity shipped in this reporting year: (214)

Sec. IV NEW WASTE MINIMIZATION ACTIVITIES

A. Did new activities in this year result in minimization of this waste? (224) N Y= Yes (Cont. to Box B) N= No (Cont. to Sec. V)

B. Activity (225) W (228) W (231) W (234) W C. Other effects (Y=Yes, N=No) (237)

D. Quantity recycled in reporting year due to new activities (238)

E. Activity/production index (248) F. Reporting year Source reduction quantity (251)

Sec. V REGULATED STORAGE

A. Did this site store RCRA wastes 90 days or more and then ship it off-site (to site shown in Section III)? (Y=Yes, N=No) (261) Y

B. Did this site store RCRA wastes on-site for more than 90 days but waste is in storage at year end: (Y= Yes, N= No) (262) N

Quantity stored at year end and for 90 days or more that was generated this reporting year: (263)

Quantity stored at year end that was generated prior to this reporting year: (275)

COMMENTS: (287) N Enter Y (Yes) if you have comments regarding this page and attach extra sheet.

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Instructions for this form found on pages 13 - 30.

Sec. I WASTE DESCRIPTION

A. Waste Description: Waste flammable liquid; Methylene chloride

B. EPA Hazardous Waste Code (35) F002 (34) D007 (33) ____ (42) ____ (44) ____

C. SIC code (80) 8221

D. Origin Code (14) 1 System type (66) M ____ E. Source code (68) A94 (62) A____ (65) A____

F. Point of measurement (88) 1 G. Waste form code (69) B204

H. Radioactive mixed (75) 2 I. TRI constituent (74) 1

J. CAS numbers: 1. (76) ____ 2. (85) ____ 3. (91) ____

4. (99) ____ 5. (107) ____

Sec. II QUANTITY GENERATED AND MANAGED ON-SITE

A. UOM (115) 1 Density (116) 8.30 lbs/gal *(Same unit and density must be used for all quantities on this page)*

Quantity generated in : B Previous reporting year (126) 2200. C. Current reporting year (135) 1110.0

D. Did this location do any of the following to this waste (at this location): manage in exempt or regulated treatment, recycling, or disposal process? (120) N Y= Yes (Continue to System 1) N= No (Skip to Sec. III)

On-Site System 1: System Type (141) M ____ Quantity managed on-site this year (146) ____

On-Site System 2: System Type (155) M ____ Quantity managed on-site this year (160) ____

Sec. III OFF-SITE SHIPMENT

A. Was any of this waste shipped off site this reporting year? (165) Y Y= Yes (Continue to Box B) N= No (Skip to Sec. IV)

Site 1: Name and address of facility: Industrial Fuel and Resources
604 South Scott St
South Bend IN 46625

B. U.S. EPA ID No. of facility waste was shipped to: (170) IND980590947

C. System type shipped to (182) M059 D. Off-site availability code (186) 1

E. Total quantity shipped in this reporting year: (187) 1110.0

Site 2: Name and address of facility:

B. U.S. EPA ID No. of facility waste was shipped to: (197) ____

C. System type shipped to (208) M____ D. Off-site availability code (213) ____

E. Total quantity shipped in this reporting year: (214) ____

Sec. IV NEW WASTE MINIMIZATION ACTIVITIES

A. Did new activities in this year result in minimization of this waste? (224) N Y= Yes (Cont. to Box B) N= No (Cont. to Sec. V)

B. Activity (228) W____ (229) W____ (231) W____ (234) W____ C. Other effects (Y=Yes, N=No) (237) ____

D. Quantity recycled in reporting year due to new activities (238) ____

E. Activity/production index (248) ____ F. Reporting year Source reduction quantity (251) ____

Sec. V REGULATED STORAGE

A. Did this site store RCRA wastes 90 days or more and then ship it off-site (to site shown in Section III)? (Y=Yes, N=No) (261) Y

B. Did this site store RCRA wastes on-site for more than 90 days but waste is in storage at year end: (Y= Yes, N= No) (262) N

Quantity stored at year end and for 90 days or more that was generated this reporting year: (263) ____

Quantity stored at year end that was generated prior to this reporting year: (273) ____

COMMENTS: (283) N Enter Y (Yes) if you have comments regarding this page and attach extra sheet.

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Instructions for this form found on pages 13 - 30.

Sec. I WASTE DESCRIPTION

A. Waste Description: Waste flammable solid; Acrolein
B. EPA Hazardous Waste Code D001 (30)
C. SIC code 8221 (46)
D. Origin Code 1 (54) System type M (55)
E. Source code A94 (60) A (65) A (66)
F. Point of measurement 1 (68)
G. Waste form code B (69)
H. Radioactive mixed 2 (75)
I. TRI constituent 1 (74)
J. CAS numbers: 1. (76) 2. (88) 3. (91)
4. (98) 5. (107)

Sec. II QUANTITY GENERATED AND MANAGED ON-SITE

A. UOM 1 (115) Density 10.0 (116) lbs/gal *(Same unit and density must be used for all quantities on this page)*
Quantity generated in : B Previous reporting year (118) NA . C. Current reporting year (130) 10.0
D. Did this location do any of the following to this waste (at this location): manage in exempt or regulated treatment, recycling, or disposal process? N (120) Y= Yes (Continue to System 1) N= No (Skip to Sec. III)
On-Site System 1: System Type M (141) Quantity managed on-site this year (126)
On-Site System 2: System Type M (155) Quantity managed on-site this year (169)

Sec. III OFF-SITE SHIPMENT

A. Was any of this waste shipped off site this reporting year? Y (180) Y= Yes (Continue to Box B) N= No (Skip to Sec. IV)
Site 1: Name and address of facility: Ensco
American Oil Road
El Dorado AR 71730
B. U.S. EPA ID No. of facility waste was shipped to: ARD069748192 (170)
C. System type shipped to M043 (182) D. Off-site availability code 1 (186)
E. Total quantity shipped in this reporting year: 10.0 (187)
Site 2: Name and address of facility:

B. U.S. EPA ID No. of facility waste was shipped to: (197)
C. System type shipped to M (208) D. Off-site availability code (213)
E. Total quantity shipped in this reporting year: (214)

Sec. IV NEW WASTE MINIMIZATION ACTIVITIES

A. Did new activities in this year result in minimization of this waste? N (224) Y= Yes (Cont. to Box B) N= No (Cont. to Sec. V)
B. Activity W (225) W (226) W (231) W (234) C. Other effects (Y=Yes, N=No) (237)
D. Quantity recycled in reporting year due to new activities (238)
E. Activity/production index (248) F. Reporting year Source reduction quantity (251)

Sec. V REGULATED STORAGE

A. Did this site store RCRA wastes 90 days or more and then ship it off-site (to site shown in Section III)? (Y=Yes, N=No) Y (261)
B. Did this site store RCRA wastes on-site for more than 90 days but waste is in storage at year end: (Y= Yes, N= No) N (262)
Quantity stored at year end and for 90 days or more that was generated this reporting year: (263)
Quantity stored at year end that was generated prior to this reporting year: (273)

COMMENTS: N (299) Enter Y (Yes) if you have comments regarding this page and attach extra sheet.

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Instructions for this form found on pages 13 - 30.

Sec. I WASTE DESCRIPTION

A. Waste Description: Hazardous Waste Solid (containing Mercury)

B. EPA Hazardous Waste Code D009 (30) (34) (38) (42) (46)

C. SIC code 8221 (50)

D. Origin Code 1 (54) System type M (55) E. Source code A94 (59) A (62) A (66)

F. Point of measurement 1 (67) G. Waste form code B319 (68)

H. Radioactive mixed 2 (73) I. TRI constituent 1 (74)

J. CAS numbers: 1. (75) 2. (88) 3. (91)

4. (99) 5. (107)

Sec. II QUANTITY GENERATED AND MANAGED ON-SITE

A. UOM 1 (115) Density 100.0 (116) lbs/gal *(Same unit and density must be used for all quantities on this page)*

Quantity generated in : B Previous reporting year (120) NA . C. Current reporting year (135) 220.0

D. Did this location do any of the following to this waste (at this location): manage in exempt or regulated treatment, recycling, or disposal process? N (120) Y= Yes (Continue to System 1) N= No (Skip to Sec. III)

On-Site System 1: System Type M (141) Quantity managed on-site this year (145)

On-Site System 2: System Type M (155) Quantity managed on-site this year (159)

Sec. III OFF-SITE SHIPMENT

A. Was any of this waste shipped off site this reporting year? Y (165) Y= Yes (Continue to Box B) N= No (Skip to Sec. IV)

Site 1: Name and address of facility:
Drug and Laboratory Disposal, Inc.
P. O. Box 490
Plainwell, MI 49080

B. U.S. EPA ID No. of facility waste was shipped to: MID^09 294 792 8 (170)

C. System type shipped to M 125 (182) D. Off-site availability code 1 (186)

E. Total quantity shipped in this reporting year: 220.0 (187)

Site 2: Name and address of facility:

B. U.S. EPA ID No. of facility waste was shipped to: (197)

C. System type shipped to M (209) D. Off-site availability code (213)

E. Total quantity shipped in this reporting year: (214)

Sec. IV NEW WASTE MINIMIZATION ACTIVITIES

A. Did new activities in this year result in minimization of this waste? N (254) Y= Yes (Cont. to Box B) N= No (Cont. to Sec. V)

B. Activity W (226) W (228) W (231) W (234) C. Other effects (Y=Yes, N=No) (237)

D. Quantity recycled in reporting year due to new activities (238)

E. Activity/production index (248) F. Reporting year Source reduction quantity (251)

Sec. V REGULATED STORAGE

A. Did this site store RCRA wastes 90 days or more and then ship it off-site (to site shown in Section III)? (Y=Yes, N=No) Y (261)

B. Did this site store RCRA wastes on-site for more than 90 days but waste is in storage at year end: (Y= Yes, N= No) N (262)

Quantity stored at year end and for 90 days or more that was generated this reporting year: (263)

Quantity stored at year end that was generated prior to this reporting year: (273)

COMMENTS: Y (283) Enter Y (Yes) if you have comments regarding this page and attach extra sheet.

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Instructions for this form found on pages 13 - 30.

Sec. I WASTE DESCRIPTION

A. Waste Description: Waste flammable liquid; Lab Packs

B. EPA Hazardous Waste Code (30) L A B P (34) (38) (42) (46)

C. SIC code (50) 8 2 2 1

D. Origin Code (54) 1 System type (55) M E. Source code (59) A 9 4 (62) A (66) A

F. Point of measurement (68) 1 G. Waste form code (69) B 0 0 3

H. Radioactive mixed (73) 2 I. TRI constituent (74) 1

J. CAS numbers: 1. (75) 2. (83) 3. (91)

4. (99) 5. (107)

Sec. II QUANTITY GENERATED AND MANAGED ON-SITE

A. UOM (115) 1 Density (116) 8.30 lbs/gal *(Same unit and density must be used for all quantities on this page)*

Quantity generated in : B Previous reporting year (120) NA C. Current reporting year (130) 88.0

D. Did this location do any of the following to this waste (at this location): manage in exempt or regulated treatment, recycling, or disposal process? (140) N Y= Yes (Continue to System 1) N= No (Skip to Sec. III)

On-Site System 1: System Type (141) M Quantity managed on-site this year (148)

On-Site System 2: System Type (156) M Quantity managed on-site this year (160)

Sec. III OFF-SITE SHIPMENT

A. Was any of this waste shipped off site this reporting year? (166) Y Y= Yes (Continue to Box B) N= No (Skip to Sec. IV)

Site 1: Name and address of facility: Laidlaw Environmental Services of Illinois, Inc.
6125 N Pecatonica Rd, Pecatonica
IL 61063

B. U.S. EPA ID No. of facility waste was shipped to: (170) I L D 9 8 0 5 0 2 7 4 4

C. System type shipped to (182) M 1 4 1 D. Off-site availability code (186) 1

E. Total quantity shipped in this reporting year: (187) 88.0

Site 2: Name and address of facility:

B. U.S. EPA ID No. of facility waste was shipped to: (197)

C. System type shipped to (209) M D. Off-site availability code (213)

E. Total quantity shipped in this reporting year: (214)

Sec. IV NEW WASTE MINIMIZATION ACTIVITIES

A. Did new activities in this year result in minimization of this waste? (224) N Y= Yes (Cont. to Box B) N= No (Cont. to Sec. V)

B. Activity (225) W (228) W (231) W (234) W C. Other effects (Y=Yes, N=No) (237)

D. Quantity recycled in reporting year due to new activities (238)

E. Activity/production index (248) F. Reporting year Source reduction quantity (251)

Sec. V REGULATED STORAGE

A. Did this site store RCRA wastes 90 days or more and then ship it off-site (to site shown in Section III)? (Y=Yes, N=No) (261) Y

B. Did this site store RCRA wastes on-site for more than 90 days but waste is in storage at year end: (Y= Yes, N= No) (262) N

Quantity stored at year end and for 90 days or more that was generated this reporting year: (263)

Quantity stored at year end that was generated prior to this reporting year: (273)

COMMENTS: (283) Y Enter Y (Yes) if you have comments regarding this page and attach extra sheet.

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Instructions for this form found on pages 13 - 30.

Sec. I WASTE DESCRIPTION

A. Waste Description: Waste Corrosive liquid; Lab Packs

B. EPA Hazardous Waste Code D002 (30) D007 (34) (38) (42) (46)

C. SIC code 8221 (50)

D. Origin Code 1 (54) System type M (55)

E. Source code A94 (58) A (62) A (66)

F. Point of measurement 1 (68)

G. Waste form code B003 (62)

H. Radioactive mixed 2 (73)

I. TRI constituent 1 (74)

J. CAS numbers: 1. (75) 2. (83) 3. (91)
4. (99) 5. (107)

Sec. II QUANTITY GENERATED AND MANAGED ON-SITE

A. UOM 1 (115) Density 8.30 (116) lbs/gal *(Same unit and density must be used for all quantities on this page)*

Quantity generated in : B Previous reporting year (120) NA . C. Current reporting year (130) 12.

D. Did this location do any of the following to this waste (at this location): manage in exempt or regulated treatment, recycling, or disposal process? N (140) Y= Yes (Continue to System 1) N= No (Skip to Sec. III)

On-Site System 1: System Type M (141) Quantity managed on-site this year (146)

On-Site System 2: System Type M (155) Quantity managed on-site this year (160)

Sec. III OFF-SITE SHIPMENT

A. Was any of this waste shipped off site this reporting year? Y (165) Y= Yes (Continue to Box B) N= No (Skip to Sec. IV)

Site 1: Name and address of facility: Laidlaw Environmental Services of Illinois, Inc.
6125 N Pecatonica Rd, Pecatonica
IL 61063

B. U.S. EPA ID No. of facility waste was shipped to: ILD980502744 (170)

C. System type shipped to M141 (182) D. Off-site availability code 1 (186)

E. Total quantity shipped in this reporting year: 12.0 (187)

Site 2: Name and address of facility:

B. U.S. EPA ID No. of facility waste was shipped to: (197)

C. System type shipped to M (209) D. Off-site availability code (213)

E. Total quantity shipped in this reporting year: (214)

Sec. IV NEW WASTE MINIMIZATION ACTIVITIES

A. Did new activities in this year result in minimization of this waste? N (224) Y= Yes (Cont. to Box B) N= No (Cont. to Sec. V)

B. Activity W (225) W (228) W (231) W (234) C. Other effects (Y=Yes, N=No) (237)

D. Quantity recycled in reporting year due to new activities (238)

E. Activity/production index (248) F. Reporting year Source reduction quantity (251)

Sec. V REGULATED STORAGE

A. Did this site store RCRA wastes 90 days or more and then ship it off-site (to site shown in Section III)? (Y=Yes, N=No) Y (261)

B. Did this site store RCRA wastes on-site for more than 90 days but waste is in storage at year end: (Y= Yes, N= No) N (262)

Quantity stored at year end and for 90 days or more that was generated this reporting year: (263)

Quantity stored at year end that was generated prior to this reporting year: (273)

COMMENTS: Y (282) Enter Y (Yes) if you have comments regarding this page and attach extra sheet.

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Instructions for this form found on pages 13 - 30.

Sec. I WASTE DESCRIPTION

A. Waste Description: Hazardous Waste liquid; Lab Packs

B. EPA Hazardous Waste Code (30) L A B P (34) (38) (42) (46)

C. SIC code (50) 8 2 2 1

D. Origin Code (54) 1 System type (55) M

E. Source code (58) A 9 4 (62) A (66) A

F. Point of measurement (68) 1

G. Waste form code (69) B 0 0 3

H. Radioactive mixed (73) 2

I. TRI constituent (74) 1

J. CAS numbers: 1. (75) 2. (83) 3. (91)
4. (99) 5. (107)

Sec. II QUANTITY GENERATED AND MANAGED ON-SITE

A. UOM (115) 1 Density (116) 8.30 lbs/gal *(Same unit and density must be used for all quantities on this page)*

Quantity generated in : B Previous reporting year (125) NA . C. Current reporting year (130) 44.0

D. Did this location do any of the following to this waste (at this location): manage in exempt or regulated treatment, recycling, or disposal process? (140) N Y= Yes (Continue to System 1) N= No (Skip to Sec. III)

On-Site System 1: System Type (141) M Quantity managed on-site this year (146)

On-Site System 2: System Type (156) M Quantity managed on-site this year (160)

Sec. III OFF-SITE SHIPMENT

A. Was any of this waste shipped off site this reporting year? (168) Y Y= Yes (Continue to Box B) N= No (Skip to Sec. IV)

Site 1: Name and address of facility: Laidlaw Environmental Services of Illinois, Inc.
6125 N Pecatonica Rd, Pecatonica
IL 61063

B. U.S. EPA ID No. of facility waste was shipped to: (170) I L D 9 8 0 5 0 2 7 4 4

C. System type shipped to (182) M 1 4 1 D. Off-site availability code (198) 1

E. Total quantity shipped in this reporting year: (187) 44.0

Site 2: Name and address of facility:

B. U.S. EPA ID No. of facility waste was shipped to: (197)

C. System type shipped to (209) M D. Off-site availability code (213)

E. Total quantity shipped in this reporting year: (214)

Sec. IV NEW WASTE MINIMIZATION ACTIVITIES

A. Did new activities in this year result in minimization of this waste? (224) N Y= Yes (Cont. to Box B) N= No (Cont. to Sec. V)

B. Activity (225) W (226) W (231) W (234) W C. Other effects (Y=Yes, N=No) (237)

D. Quantity recycled in reporting year due to new activities (238)

E. Activity/production index (246) F. Reporting year Source reduction quantity (251)

Sec. V REGULATED STORAGE

A. Did this site store RCRA wastes 90 days or more and then ship it off-site (to site shown in Section III)? (Y=Yes, N=No) (261) Y

B. Did this site store RCRA wastes on-site for more than 90 days but waste is in storage at year end: (Y= Yes, N= No) (262) N

Quantity stored at year end and for 90 days or more that was generated this reporting year: (263)

Quantity stored at year end that was generated prior to this reporting year: (273)

COMMENTS: (287) Y Enter Y (Yes) if you have comments regarding this page and attach extra sheet.

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ILLINOIS Environmental Protection Agency
1992 Hazardous Waste Report
Form GM – Waste Generation and Manageme

Instructions for this form found on pages 13 - 30.

Sec. I WASTE DESCRIPTION

A. Waste Description: Hazardous waste solid; Mercury (Lab Pack)
B. EPA Hazardous Waste Code D009 (30)
C. SIC code 8221 (50)
D. Origin Code 1 (54) System type M (55)
E. Source code A94 (59) A (62) A (65)
F. Point of measurement 1 (66)
G. Waste form code B003 (69)
H. Radioactive mixed 2 (73)
I. TRI constituent 1 (74)
J. CAS numbers: 1. (76) 2. (83) 3. (91)
4. (99) 5. (107)

Sec. II QUANTITY GENERATED AND MANAGED ON-SITE

A. UOM 1 (115) Density 10.0 (116) lbs/gal *(Same unit and density must be used for all quantities on this page)*
Quantity generated in : B Previous reporting year (129) NA . C. Current reporting year (130) 2.0
D. Did this location do any of the following to this waste (at this location): manage in exempt or regulated treatment, recycling, or disposal process? (140) Y= Yes (Continue to System 1) N= No (Skip to Sec. III)
On-Site System 1: System Type M (141) Quantity managed on-site this year (145)
On-Site System 2: System Type M (186) Quantity managed on-site this year (189)

Sec. III OFF-SITE SHIPMENT

A. Was any of this waste shipped off site this reporting year? Y (169) Y= Yes (Continue to Box B) N= No (Skip to Sec. IV)
Site 1: Name and address of facility: Laidlaw Environmental Services of Illinois, Inc.
6125 N Pecatonica Rd, Pecatonica
IL 61063
B. U.S. EPA ID No. of facility waste was shipped to: ILD980502744 (170)
C. System type shipped to M141 (182) D. Off-site availability code 1 (186)
E. Total quantity shipped in this reporting year: 2.0 (187)
Site 2: Name and address of facility:

B. U.S. EPA ID No. of facility waste was shipped to: (197)
C. System type shipped to M (209) D. Off-site availability code (213)
E. Total quantity shipped in this reporting year: (214)

Sec. IV NEW WASTE MINIMIZATION ACTIVITIES

A. Did new activities in this year result in minimization of this waste? N (224) Y= Yes (Cont. to Box B) N= No (Cont. to Sec. V)
B. Activity W (225) W (228) W (231) W (234) C. Other effects (Y=Yes, N=No) (237)
D. Quantity recycled in reporting year due to new activities (238)
E. Activity/production index (248) F. Reporting year Source reduction quantity (251)

Sec. V REGULATED STORAGE

A. Did this site store RCRA wastes 90 days or more and then ship it off-site (to site shown in Section III)? (Y=Yes, N=No) Y (261)
Did this site store RCRA wastes on-site for more than 90 days but waste is in storage at year end: (Y= Yes, N= No) N (262)
Quantity stored at year end and for 90 days or more that was generated this reporting year: (263)
Quantity stored at year end that was generated prior to this reporting year: (273)

COMMENTS: Y (292) Enter Y (Yes) if you have comments regarding this page and attach extra sheet.

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Instructions for this form found on pages 13 - 30.

Sec. I WASTE DESCRIPTION

A. Waste Description: Waste corrosive solid; Benzoic Acid and Titanium trichloride
B. EPA Hazardous Waste Code (30) D003 (34) D002 (38) (42) (46)
C. SIC code (50) 8221
D. Origin Code (54) 1 System type (55) M E. Source code (59) A94 (62) A (66) A
F. Point of measurement (68) 1 G. Waste form code (69) B003
H. Radioactive mixed (73) 2 I. TRI constituent (74) 1
J. CAS numbers: 1. (75) 2. (83) 3. (91)
4. (99) 5. (107)

Sec. II QUANTITY GENERATED AND MANAGED ON-SITE

A. UOM (115) 1 Density (116) 10.0 lbs/gal *(Same unit and density must be used for all quantities on this page)*
Quantity generated in : B Previous reporting year (120) NA C. Current reporting year (130) 2.0
D. Did this location do any of the following to this waste (at this location): manage in exempt or regulated treatment, recycling, or disposal process? (140) N Y= Yes (Continue to System 1) N= No (Skip to Sec. III)
On-Site System 1: System Type (141) M Quantity managed on-site this year (146)
On-Site System 2: System Type (155) M Quantity managed on-site this year (159)

Sec. III OFF-SITE SHIPMENT

A. Was any of this waste shipped off site this reporting year? (169) Y Y= Yes (Continue to Box B) N= No (Skip to Sec. IV)
Site 1: Name and address of facility: Laidlaw Environmental Services of Illinois, Inc.
6125 N Pecatonica Rd, Pecatonica
IL 61063
B. U.S. EPA ID No. of facility waste was shipped to: (170) ILD980502744
C. System type shipped to (182) M141 D. Off-site availability code (186) 1
E. Total quantity shipped in this reporting year: (187) 2.0
Site 2: Name and address of facility:

B. U.S. EPA ID No. of facility waste was shipped to: (197)
C. System type shipped to (209) M D. Off-site availability code (213)
E. Total quantity shipped in this reporting year: (214)

Sec. IV NEW WASTE MINIMIZATION ACTIVITIES

A. Did new activities in this year result in minimization of this waste? (224) N Y= Yes (Cont. to Box B) N= No (Cont. to Sec. V)
B. Activity (226) W (228) W (231) W (234) W C. Other effects (Y=Yes, N=No) (237)
D. Quantity recycled in reporting year due to new activities (238)
E. Activity/production index (246) F. Reporting year Source reduction quantity (251)

Sec. V REGULATED STORAGE

A. Did this site store RCRA wastes 90 days or more and then ship it off-site (to site shown in Section III)? (Y=Yes, N=No) (261) Y
B. Did this site store RCRA wastes on-site for more than 90 days but waste is in storage at year end: (Y= Yes, N= No) (262) N
Quantity stored at year end and for 90 days or more that was generated this reporting year: (263)
Quantity stored at year end that was generated prior to this reporting year: (273)

COMMENTS: (287) Y Enter Y (Yes) if you have comments regarding this page and attach extra sheet.

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1992 Hazardous Waste Report
Form GM – Waste Generation and Manageme

Instructions for this form found on pages 13 - 30.

Sec. I WASTE DESCRIPTION

A. Waste Description: Waste poison B., Liquid; Sodium Azide
B. EPA Hazardous Waste Code P105 (30) (34) (38) (42) (46)
C. SIC code 8221 (50)
D. Origin Code 1 (54) System type M (55)
E. Source code A94 (59) A (62) A (65)
F. Point of measurement 1 (66)
G. Waste form code B004 (69)
H. Radioactive mixed 2 (73)
I. TRI constituent 1 (74)
J. CAS numbers: 1. (76) 2. (83) 3. (91)
4. (99) 5. (107)

Sec. II QUANTITY GENERATED AND MANAGED ON-SITE

A. UOM 1 (115) Density 10.0 (116) lbs/gal *(Same unit and density must be used for all quantities on this page)*
Quantity generated in : B Previous reporting year (120) NA . C. Current reporting year (130) 5.0
D. Did this location do any of the following to this waste (at this location): manage in exempt or regulated treatment, recycling, or disposal process? N (140) Y= Yes (Continue to System 1) N= No (Skip to Sec. III)
On-Site System 1: System Type M (141) Quantity managed on-site this year (145)
On-Site System 2: System Type M (156) Quantity managed on-site this year (159)

Sec. III OFF-SITE SHIPMENT

A. Was any of this waste shipped off site this reporting year? Y (169) Y= Yes (Continue to Box B) N= No (Skip to Sec. IV)
Site 1: Name and address of facility: Laidlaw Environmental Services of Illinois, Inc.
6125 N Pecatonica Rd, Pecatonica
IL 61063
B. U.S. EPA ID No. of facility waste was shipped to: ILD980502744 (170)
C. System type shipped to M141 (182) D. Off-site availability code 1 (186)
E. Total quantity shipped in this reporting year: 50 (187)
Site 2: Name and address of facility:

B. U.S. EPA ID No. of facility waste was shipped to: (197)
C. System type shipped to M (209) D. Off-site availability code (213)
E. Total quantity shipped in this reporting year: (214)

Sec. IV NEW WASTE MINIMIZATION ACTIVITIES

A. Did new activities in this year result in minimization of this waste? N (224) Y= Yes (Cont. to Box B) N= No (Cont. to Sec. V)
B. Activity W (225) W (228) W (231) W (234) C. Other effects (Y=Yes, N=No) (237)
D. Quantity recycled in reporting year due to new activities (238)
E. Activity/production index (248) F. Reporting year Source reduction quantity (251)

Sec. V REGULATED STORAGE

A. Did this site store RCRA wastes 90 days or more and then ship it off-site (to site shown in Section III)? (Y=Yes, N=No) Y (261)
B. Did this site store RCRA wastes on-site for more than 90 days but waste is in storage at year end: (Y= Yes, N= No) N (262)
Quantity stored at year end and for 90 days or more that was generated this reporting year: (263)
Quantity stored at year end that was generated prior to this reporting year: (273)

COMMENTS: Y (282) Enter Y (Yes) if you have comments regarding this page and attach extra sheet.

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Instructions for this form found on pages 13 - 30.

Sec. I WASTE DESCRIPTION

A. Waste Description: Waste poison.B., liquid; Lead based paint

B. EPA Hazardous Waste Code D003 (30) D008 (34) (38) (42) (46)

C. SIC code 8221 (50)

D. Origin Code 1 (54) System type M (55) E. Source code A94 (58) A (62) A (66)

F. Point of measurement 1 (68) G. Waste form code B003 (69)

H. Radioactive mixed 2 (73) I. TRI constituent 1 (74)

J. CAS numbers: 1. (75) 2. (83) 3. (91)

4. (99) 5. (107)

Sec. II QUANTITY GENERATED AND MANAGED ON-SITE

A. UOM 1 (115) Density (116) 8.30 lbs/gal *(Same unit and density must be used for all quantities on this page)*

Quantity generated in : B Previous reporting year (120) NA C. Current reporting year (130) 8.0

D. Did this location do any of the following to this waste (at this location): manage in exempt or regulated treatment, recycling, or disposal process? N (140) Y= Yes (Continue to System 1) N= No (Skip to Sec. III)

On-Site System 1: System Type M (141) Quantity managed on-site this year (145)

On-Site System 2: System Type M (156) Quantity managed on-site this year (160)

Sec. III OFF-SITE SHIPMENT

A. Was any of this waste shipped off site this reporting year? Y (165) Y= Yes (Continue to Box B) N= No (Skip to Sec. IV)

Site 1: Name and address of facility: Laidlaw Environmental Services of Illinois, Inc.
6125 N Pecatonica Rd, Pecatonica
IL 61063

B. U.S. EPA ID No. of facility waste was shipped to: ILD980502744 (170)

C. System type shipped to M141 (182) D. Off-site availability code 1 (186)

E. Total quantity shipped in this reporting year: (187) 8.0

Site 2: Name and address of facility:

B. U.S. EPA ID No. of facility waste was shipped to: (197)

C. System type shipped to M (209) D. Off-site availability code (213)

E. Total quantity shipped in this reporting year: (214)

Sec. IV NEW WASTE MINIMIZATION ACTIVITIES

A. Did new activities in this year result in minimization of this waste? N (224) Y= Yes (Cont. to Box B) N= No (Cont. to Sec. V)

B. Activity W (225) W (228) W (231) W (234) C. Other effects (Y=Yes, N=No) (237)

D. Quantity recycled in reporting year due to new activities (238)

E. Activity/production index (246) F. Reporting year Source reduction quantity (251)

Sec. V REGULATED STORAGE

A. Did this site store RCRA wastes 90 days or more and then ship it off-site (to site shown in Section III)? (Y=Yes, N=No) Y (261)

B. Did this site store RCRA wastes on-site for more than 90 days but waste is in storage at year end: (Y= Yes, N= No) N (262)

Quantity stored at year end and for 90 days or more that was generated this reporting year: (263)

Quantity stored at year end that was generated prior to this reporting year: (273)

COMMENTS: Y (282) Enter Y (Yes) if you have comments regarding this page and attach extra sheet.

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Instructions for this form found on pages 13 - 30.

Sec. I WASTE DESCRIPTION

A. Waste Description: Waste oxidizer; Lab Packs
B. EPA Hazardous Waste Code (30) D001 (34) (38) (42) (46)
C. SIC code (50) 8221
D. Origin Code (54) 1 System type (56) M E. Source code (59) A94 (62) A (66) A
F. Point of measurement (68) 1 G. Waste form code (69) B003
H. Radioactive mixed (73) 2 I. TRI constituent (74) 1
J. CAS numbers: 1. (75) 2. (83) 3. (91)
4. (99) 5. (107)

Sec. II QUANTITY GENERATED AND MANAGED ON-SITE

A. UOM (115) 1 Density (116) 10.0 lbs/gal *(Same unit and density must be used for all quantities on this page)*
Quantity generated in : B Previous reporting year (120) NA . C. Current reporting year (130) 4.0
D. Did this location do any of the following to this waste (at this location): manage in exempt or regulated treatment, recycling, or disposal process? (140) N Y= Yes (Continue to System 1) N= No (Skip to Sec. III)
On-Site System 1: System Type (141) M Quantity managed on-site this year (145)
On-Site System 2: System Type (155) M Quantity managed on-site this year (159)

Sec. III OFF-SITE SHIPMENT

A. Was any of this waste shipped off site this reporting year? (165) Y Y= Yes (Continue to Box B) N= No (Skip to Sec. IV)
Site 1: Name and address of facility: Laidlaw Environmental Services of Illinois, Inc.
6125 N Pecatonica Rd, Pecatonica
IL 61063
B. U.S. EPA ID No. of facility waste was shipped to: (170) ILD980502744
C. System type shipped to (182) M141 D. Off-site availability code (186) 1
E. Total quantity shipped in this reporting year: (187) 4.0
Site 2: Name and address of facility:

B. U.S. EPA ID No. of facility waste was shipped to: (197)
C. System type shipped to (209) M D. Off-site availability code (213)
E. Total quantity shipped in this reporting year: (214)

Sec. IV NEW WASTE MINIMIZATION ACTIVITIES

A. Did new activities in this year result in minimization of this waste? (224) N Y= Yes (Cont. to Box B) N= No (Cont. to Sec. V)
B. Activity (226) W (228) W (231) W (234) W C. Other effects (Y=Yes, N=No) (237)
D. Quantity recycled in reporting year due to new activities (238)
E. Activity/production index (248) F. Reporting year Source reduction quantity (251)

Sec. V REGULATED STORAGE

A. Did this site store RCRA wastes 90 days or more and then ship it off-site (to site shown in Section III)? (Y=Yes, N=No) (261) Y
B. Did this site store RCRA wastes on-site for more than 90 days but waste is in storage at year end: (Y= Yes, N= No) (262) N
Quantity stored at year end and for 90 days or more that was generated this reporting year: (263)
Quantity stored at year end that was generated prior to this reporting year: (273)

COMMENTS: (283) Y Enter Y (Yes) if you have comments regarding this page and attach extra sheet.

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Instructions for this form found on pages 13 - 30.

Sec. I WASTE DESCRIPTION

A. Waste Description: Waste poison B., solid; Lab Packs

B. EPA Hazardous Waste Code (30) D011 (34) D007 (38) D009 (42) ____ (46) ____

C. SIC code (50) 8221

D. Origin Code (54) 1 System type (55) M ____ E. Source code (59) A94 (62) A__ (65) A__

F. Point of measurement (68) 1 G. Waste form code (69) B003

H. Radioactive mixed (73) 2 I. TRI constituent (74) 1

J. CAS numbers: 1. (75) ____-__-__ 2. (83) ____-__-__ 3. (91) ____-__-__

4. (99) ____-__-__ 5. (107) ____-__-__

Sec. II QUANTITY GENERATED AND MANAGED ON-SITE

A. UOM (115) 1 Density (116) 100.__ lbs/gal *(Same unit and density must be used for all quantities on this page)*

Quantity generated in : B Previous reporting year (128) NA.__ C. Current reporting year (130) 10.0

D. Did this location do any of the following to this waste (at this location): manage in exempt or regulated treatment, recycling, or disposal process? (140) N Y= Yes (Continue to System 1) N= No (Skip to Sec. III)

On-Site System 1: System Type (141) M ____ Quantity managed on-site this year (145) ____.__

On-Site System 2: System Type (155) M ____ Quantity managed on-site this year (169) ____.__

Sec. III OFF-SITE SHIPMENT

A. Was any of this waste shipped off site this reporting year? (180) Y Y= Yes (Continue to Box B) N= No (Skip to Sec. IV)

Site 1: Name and address of facility: Laidlaw Environmental Services of Illinois, Inc.
6125 N Pecatonica Rd, Pecatonica
IL 61063

B. U.S. EPA ID No. of facility waste was shipped to: (170) ILD980502744

C. System type shipped to (182) M141 D. Off-site availability code (189) 1

E. Total quantity shipped in this reporting year: (187) 10.0

Site 2: Name and address of facility:

B. U.S. EPA ID No. of facility waste was shipped to: (197) ____

C. System type shipped to (209) M____ D. Off-site availability code (213) __

E. Total quantity shipped in this reporting year: (214) ____.__

Sec. IV NEW WASTE MINIMIZATION ACTIVITIES

A. Did new activities in this year result in minimization of this waste? (224) N Y= Yes (Cont. to Box B) N= No (Cont. to Sec. V)

B. Activity (225) W__ (228) W__ (231) W__ (234) W__ C. Other effects (Y=Yes, N=No) (237) __

D. Quantity recycled in reporting year due to new activities (238) ____.__

E. Activity/production index (248) __.__ F. Reporting year Source reduction quantity (251) ____.__

Sec. V REGULATED STORAGE

A. Did this site store RCRA wastes 90 days or more and then ship it off-site (to site shown in Section III)? (Y=Yes, N=No) (261) Y

Did this site store RCRA wastes on-site for more than 90 days but waste is in storage at year end: (Y= Yes, N= No) (262) N

Quantity stored at year end and for 90 days or more that was generated this reporting year: (263) ____.__

Quantity stored at year end that was generated prior to this reporting year: (273) ____.__

COMMENTS: (283) Y Enter Y (Yes) if you have comments regarding this page and attach extra sheet.

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Instructions for this form found on pages 13 - 30.

Sec. I WASTE DESCRIPTION

A. Waste Description: Waste Zinc powder

B. EPA Hazardous Waste Code D003 (30)

C. SIC code 8221 (50)

D. Origin Code 1 (54) System type M (55)

E. Source code A94 (59) A (62) A (66)

F. Point of measurement 1 (68)

G. Waste form code B003 (69)

H. Radioactive mixed 2 (73)

I. TRI constituent 1 (74)

J. CAS numbers: 1. (76) 2. (83) 3. (91)
4. (99) 5. (107)

Sec. II QUANTITY GENERATED AND MANAGED ON-SITE

A. UOM 1 (115) Density 10.0 (116) lbs/gal *(Same unit and density must be used for all quantities on this page)*

Quantity generated in : B Previous reporting year (120) NA . C. Current reporting year (130) 1.0

D. Did this location do any of the following to this waste (at this location): manage in exempt or regulated treatment, recycling, or disposal process? N (140) Y= Yes (Continue to System 1) N= No (Skip to Sec. III)

On-Site System 1: System Type M (141) Quantity managed on-site this year (145)

On-Site System 2: System Type M (186) Quantity managed on-site this year (150)

Sec. III OFF-SITE SHIPMENT

A. Was any of this waste shipped off site this reporting year? Y (165) Y= Yes (Continue to Box B) N= No (Skip to Sec. IV)

Site 1: Name and address of facility:
Laidlaw Environmental Services of Illinois, Inc.
6125 N Pecatonica Rd, Pecatonica
IL 61063

B. U.S. EPA ID No. of facility waste was shipped to: ILD980502744 (170)

C. System type shipped to M141 (182) D. Off-site availability code 1 (186)

E. Total quantity shipped in this reporting year: 10 (187)

Site 2: Name and address of facility:

B. U.S. EPA ID No. of facility waste was shipped to: (197)

C. System type shipped to M (209) D. Off-site availability code (213)

E. Total quantity shipped in this reporting year: (214)

Sec. IV NEW WASTE MINIMIZATION ACTIVITIES

A. Did new activities in this year result in minimization of this waste? N (224) Y= Yes (Cont. to Box B) N= No (Cont. to Sec. V)

B. Activity W (225) W (228) W (231) W (234) C. Other effects (Y=Yes, N=No) (237)

D. Quantity recycled in reporting year due to new activities (236)

E. Activity/production index (248) F. Reporting year Source reduction quantity (251)

Sec. V REGULATED STORAGE

A. Did this site store RCRA wastes 90 days or more and then ship it off-site (to site shown in Section III)? (Y=Yes, N=No) Y (261)

B. Did this site store RCRA wastes on-site for more than 90 days but waste is in storage at year end: (Y= Yes, N= No) N (262)

Quantity stored at year end and for 90 days or more that was generated this reporting year: (263)

Quantity stored at year end that was generated prior to this reporting year: (273)

COMMENTS: Y (299) Enter Y (Yes) if you have comments regarding this page and attach extra sheet.

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Sec. I WASTE DESCRIPTION

A. Waste Description: Waste flammable solid; Sodium Hydrosulfide and Calcium Hydride

B. EPA Hazardous Waste Code D001 (30) D003 (34) ____ (38) ____ (42) ____ (46)

C. SIC code 8221 (50)

D. Origin Code 1 (64) System type M (65) ____

E. Source code A94 (69) A____ (62) A____ (66)

F. Point of measurement 1 (68)

G. Waste form code B003 (60)

H. Radioactive mixed 2 (73)

I. TRI constituent 1 (74)

J. CAS numbers: 1. ____ (75) 2. ____ (83) 3. ____ (91)
4. ____ (99) 5. ____ (107)

Sec. II QUANTITY GENERATED AND MANAGED ON-SITE

A. UOM 1 (115) Density 10.0 (116) lbs/gal *(Same unit and density must be used for all quantities on this page)*

Quantity generated in : B Previous reporting year NA (120). C. Current reporting year 2.0 (130)

D. Did this location do any of the following to this waste (at this location): manage in exempt or regulated treatment, recycling, or disposal process? N (140) Y= Yes (Continue to System 1) N= No (Skip to Sec. III)

On-Site System 1: System Type M (141) ____ Quantity managed on-site this year ____ (146)

On-Site System 2: System Type M (155) ____ Quantity managed on-site this year ____ (160)

Sec. III OFF-SITE SHIPMENT

A. Was any of this waste shipped off site this reporting year? Y (165) Y= Yes (Continue to Box B) N= No (Skip to Sec. IV)

Site 1: Name and address of facility: Laidlaw Environmental Services of Illinois, Inc.
6125 N Pecatonica Rd, Pecatonica
IL 61063

B. U.S. EPA ID No. of facility waste was shipped to: ILD980502744 (170)

C. System type shipped to M141 (182) D. Off-site availability code 1 (186)

E. Total quantity shipped in this reporting year: 2.0 (187)

Site 2: Name and address of facility:

B. U.S. EPA ID No. of facility waste was shipped to: ____ (197)

C. System type shipped to M____ (209) D. Off-site availability code ____ (213)

E. Total quantity shipped in this reporting year: ____ (214)

Sec. IV NEW WASTE MINIMIZATION ACTIVITIES

A. Did new activities in this year result in minimization of this waste? N (224) Y= Yes (Cont. to Box B) N= No (Cont. to Sec. V)

B. Activity W____ (225) W____ (228) W____ (231) W____ (234) C. Other effects (Y=Yes, N=No) ____ (237)

D. Quantity recycled in reporting year due to new activities ____ (238)

E. Activity/production index ____ (248) F. Reporting year Source reduction quantity ____ (251)

Sec. V REGULATED STORAGE

A. Did this site store RCRA wastes 90 days or more and then ship it off-site (to site shown in Section III)? (Y=Yes, N=No) Y (261)

B. Did this site store RCRA wastes on-site for more than 90 days but waste is in storage at year end: (Y= Yes, N= No) N (262)

Quantity stored at year end and for 90 days or more that was generated this reporting year: ____ (263)

Quantity stored at year end that was generated prior to this reporting year: ____ (273)

COMMENTS: Y (282) Enter Y (Yes) if you have comments regarding this page and attach extra sheet.

COMMENTS:

Spent Acids with Metals (Page 2)
Section I, B. D008, D011

Hazardous Waste Solid (Page 7)
Section II, C. Separated Mercury, packaged for retorting; and others were incinerated.

Waste flammable liquid; Lab Packs (Page 8)
Section I, B. D003, D005, D006, D007, D008, D009, D011
Section III, C. The waste was transfered to
Laidlaw Environmental Services (Recovery), Inc.
Crowley, LA.
The ultimate disposal method was fuel blending.
(System type code M061)

Waste Corrosive liquid; Lab Packs (Page 9)
Section III, C. The waste was transfered to
Heritage Environmental Services
Indianapolis.
The ultimate disposal method was neutralization.
(System type code M121)

Hazardous Waste Liquid (Page 10)
Section I, B. D004, D006, D007, D008, D005, D009, D011, F002
Section III, C. The waste was transfered to
ENSCO, Inc.
ELDORADO, AR.
The ultimate disposal method was incineration.
(System type code M041)

Hazardous Waste Solid; Mercury (Page 11)
Section III, C. The waste was transfered to
Laidlaw Environmental Services of South Carolina, Inc.
Pinewood, SC.
Container disposal was to land fill and waste was transfered to
Bethlehem Apparatus
Heller Town, PA.
The ultimate disposal method was heavy metal reclamation.
(System type code M019)

Waste Corrosive Liquid; Benzoic Acid and titanium trichloride
(Page 12)
Section III, C. The waste was transfered to
BDT, Inc.
Clarence, NY.
The ultimate disposal was Hydrolysis.
(System type code M125)

Waste poison B., Liquid; Sodium azide (Page 13)
Section III, C. The waste was transfered to
Ensco, Inc.
ELDORADO, AR.
The ultimate method of disposal was incineration.
(System type code M041)

Waste poison B., Liquid; Lead based paint (Page 14)
Section III, C. The waste was transfered to
Thermalkem Inc.
Rock Hill, SC.
The ultimate method of disposal was incineration.
(System type code M041)

Waste oxidizer: Lab Packs (Page 15)
Section III, C. The waste was transfered to
Thermalkem Inc.
Rock Hill, SC.
The ultimate method of disposal was incineration.
(System type code M043)

Waste poison B., solid; Lab Packs (Page 16)
Section III, C. The waste was transfered to
Thermalkem, Inc.
Rock Hill, SC.
The ultimate method of disposal was incineration.
(System type code M043)

Waste Zinc powder (Page 17)
Section III, C. The waste was transfered to
ENSCO, Inc.
ELDORADO, AR.
The ultimate method of disposal was incineration.
(System type code M043)

Waste flammable solid; Sodium Hydrosulfide and Calcium Hydride
(Page 18)
Section III, C. The waste was transfered to
ENSCO, Inc.
ELDORADO, AR.
The ultimate method of disposal was incineration.
(System type code M043)

State of Illinois
ENVIRONMENTAL PROTECTION AGENCY

Mary A. Gade, Director

2200 Churchill Road, Springfield, IL 62794-9276

Your company's 1992 Hazardous Waste Report was received by this Agency and the information has been edited. Discrepancies or errors have been identified that require review and correction by your company.

A copy of your report is enclosed. Those fields which are in question have been highlighted. Please enter correction on the report copy above the highlighted error.

To assist you in making correction(s) a computer generated list of the errors along with explanations of the error(s) is also enclosed. This list includes section number, question number, and field number of the discrepancy or error for your reference.

Within the next 15 days, please make the necessary correction(s) and return the corrected forms and error message to the following address:

Facility Reporting Unit
Illinois Environmental Protection Agency
Bureau of Land
Post Office Box 19276
Springfield, Illinois 62794-9276

If you have any questions regarding the error, contact James Langenberg at 217/785-8441 or Larry Marques at 217/785-6869.

Sincerely,

Hope Wright

Hope Wright, Manager
Reporting and Financial Assurance Unit
Planning and Reporting Section
Bureau of Land

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

REPLY TO THE ATTENTION OF:

DEC 2 8 1993

HRE-8J

David E. McDonald, Coordinator
for Environmental Control
Southern Illinois University (Edwardsville)
P.O. Box 1652
Edwardsville, Illinois 62026

Re: Southern Illinois
University (Edwardsville)
ILD 006 331 342

Dear Mr. McDonald:

The United States Environmental Protection Agency (U.S. EPA) has reviewed the information which you submitted to this office on December 16, 1993. The stated actions appear to adequately address the violations outlined in our November 22, 1993, Notice of Violation (NOV).

In reference to the November 18, 1993, inspection during your absence, the inspector apparently was not made aware of the letter dated February 4, 1993, from the Illinois Environmental Protection Agency that indicated the approval of the closure of the regulated storage areas and the withdrawal of the Part A permit application. Subsequently, Southern Illinois University (Edwardsville) was inspected as a treatment, storage, disposal (TSD) facility. Now that closure has been approved by the IEPA, all TSD requirements are no longer applicable.

Your cooperation and efforts in this matter are appreciated. Should you have further questions, please feel free to contact Barbara Russell at (312) 353-7922.

Sincerely yours,

for Joseph M. Boyle, Chief
RCRA Enforcement Branch

cc: Glen Savage, IEPA,
William Radlinski, IEPA

DEC 2 8 1993

HRE-8J

David E. McDonald, Coordinator
for Environmental Control
Southern Illinois University (Edwardsville)
P.O. Box 1652
Edwardsville, Illinois 62026

Re: Southern Illinois
University (Edwardsville)
ILD 006 331 342

Dear Mr. McDonald:

The United States Environmental Protection Agency (U.S. EPA) has reviewed the information which you submitted to this office on December 16, 1993. The stated actions appear to adequately address the violations outlined in our November 22, 1993, Notice of Violation (NOV).

In reference to the November 18, 1993, inspection during your absence, the inspector apparently was not made aware of the letter dated February 4, 1993, from the Illinois Environmental Protection Agency that indicated the approval of the closure of the regulated storage areas and the withdrawal of the Part A permit application. Subsequently, Southern Illinois University (Edwardsville) was inspected as a treatment, storage, disposal (TSD) facility. Now that closure has been approved by the IEPA, all TSD requirements are no longer applicable.

Your cooperation and efforts in this matter are appreciated. Should you have further questions, please feel free to contact Barbara Russell at (312) 353-7922.

Sincerely yours,

Joseph M. Boyle, Chief
RCRA Enforcement Branch

cc: Glen Savage, IEPA,
William Radlinski, IEPA

B.RUSSELL:ev:12/22/93:DISK #:FILENAME:SIUEDS

SIGNATURE/INITIAL CONCURRENCE REQUESTED - RCRA ENFORCEMENT BRANCH (REB)									
TYP.	AUTH	IL/IN TES CHIEF	MI/WI TES CHIEF	MN/OH TES CHIEF	IL/MI/WI EPS CHIEF	IN/MN/OH EPS CHIEF	REB BRANCH CHIEF	RCRA ASSOC. DIR.	WMD DIVISION DIRECTOR
	12/22/93				12-28-93		12-28-93		

Southern Illinois University at Edwardsville
Environmental Health and Safety
Box 1657
Edwardsville, Illinois 62026

December 16, 1993

HRE-8J
United States Environmental Protection Agency
Region 5
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

Subject: Inspection of Southern Illinois University at Edwardsville - ILD 006 331 342

Dear Sir/Madam:

The following is in response to the Environmental Protection Agency (EPA) notice of violation (NOV) letter dated November 22, 1993. As you are aware, at the time of the inspection Southern Illinois University at Edwardsville (SIUE) had completed all required closure activities and was awaiting final approval from the IEPA. Based on the IEPA inspector's site visit which was conducted on January 22, 1993, final approval was granted (see attached).

I was concerned to note that while the University had conducted all necessary steps for closure, submitted closure documentation and had ceased treatment storage and disposal (TSD) activities as of October of 1992, we were inspected as a TSD facility anyway (so apparently the IEPA inspector was conducting the on-site visit to approve closure while the EPA inspector was citing TSD violations). In my absence, another inspection was conducted since that time on November 18, 1993, in which TSD violations were mentioned. I would like an explanation as to why the University is being inspected as a TSD facility.

The University has purposefully undertaken hazardous waste minimization efforts as required by the EPA. The University has done this through utilizing micro-scale technology for Chemistry experiments, substituting non-hazardous products for hazardous products when possible, and by recycling chemicals through the Industrial Material Exchange Service which is sponsored by the IEPA. In short, the University has taken the proper position that "less is best" when it comes to hazardous waste, but is still being treated as a TSD facility. I request your cooperation in rectifying this situation by ceasing EPA inspections of the

University as a TSD facility.

In addition, I am providing the following response to the NOV's even though the regulations cited are for TSD facilities:

1. Since the inspection, Chemistry teaching assistants in the laboratories responsible for the violations have been reminded to keep the bottle caps on the bottles except when filling the container. Subsequent walk throughs of the area have revealed a significant improvement in this regard.

2. Weekly inspections of the empty storage room were resumed as a result of the EPA inspector's request (documentation attached).

3. Although SIUE is no longer a TSD facility (approval of closure attached), a chemical safety training program is being implemented for Chemistry faculty and staff as a part of the Chemical Hygiene Plan. Staff working for the Environmental Health and Safety department are trained according to hazardous waste regulatory requirements as previous inspections have revealed.

4. As you know, a formalized contingency plan is not necessary for a small quantity generator. However, as an emergency preparedness measure, the University does have a contingency plan that is currently being updated.

5. As with item number 1, listed above, teaching assistants have been reminded to properly label and date the bottles in the accumulation areas. Again, recent walk throughs of this area have revealed significant improvements.

6. The filing system is being revised for the Environmental Health and Safety department. Files containing information such as manifests are being prioritized to allow for immediate retrieval. I have attached the land ban notification sheet for manifest # IL3886279.

Should you have any questions concerning my response, please let me know.

Sincerely,

David E. McDonald
Coordinator for Environmental Control

NOV 22 1993

HRE-8J

David E. McDonald, Coordinator
for Environmental Control
Southern Illinois University (Edwardsville)
P.O. Box 1652
Edwardsville, Illinois 62026

Re: Notice of Violation
Southern Illinois University
(Edwardsville)
ILD 006 331 342

Dear Mr. McDonald:

On January 22, 1993, an inspection of Southern Illinois University (Edwardsville) was conducted by representatives of the United States Environmental Protection Agency (U.S. EPA) and the Illinois Environmental Protection Agency (IEPA). Under Section 3007 of the Resource Conservation and Recovery Act (RCRA), Federal Agencies have been granted the primary responsibility for ensuring the compliance of State facilities under their jurisdiction.

The purpose of the inspection was to determine if Southern Illinois University (Edwardsville) was in compliance with the State equivalent requirements of Subtitle C of RCRA as amended, 42 U.S.C. 6901 et seq. The State requirements are found at 35 Ill. Adm. Code Part 720 et seq. A copy of the inspection report is enclosed for your information.

As a result of the inspection, the following violations have been identified:

1. Failure to store containers holding hazardous waste closed as required by 35 Ill. Adm. Code 725.273, i.e. three one gallon hazardous waste containers were stored open in room 3211 and several open waste containers were noted in a fume hood in room 3212;

2. Failure to conduct and document weekly inspections of containers as required by 35 Ill. Adm. Code 725.274 and failure to inspect the facility for malfunctions and deterioration, operating errors, and discharges as required by Section 725.115, i.e., weekly inspections were not documented for the RCRA storage room;

3. Failure to ensure that all personnel involved in the hazardous waste RCRA management program receive training as required by 35 Ill. Adm. Code 725.116, i.e., it was noted at the time of the inspection, students, teaching assistants and professors had not completed training;

4. Failure to make arrangements with local authorities as required by 35 Ill. Adm. Code 725.137, i.e., it was noted at the time of the inspection the amended contingency plan had not been submitted to the local authorities;

5. Failure to identify contents and mark dates on all containers entering storage as required by 35 Ill. Adm. Code 722.134, i.e., at the time of the inspection, it was noted that containers were in the labs with no accumulation dates or markings indicating the contents of the container; and

6. Failure to retain on site copies of all notifications, certifications, and other relevant documents for a period of five years as required by 35 Ill. Adm. Code 728.107(a)(6). i.e., at the time of the inspection, it was noted that there was no land ban notification sheet within the files for RCRA shipping manifest IL3886279.

U.S. EPA understands that Edwardsville is closing its regulated storage area and wishes to change its status to a Small Quantity Generator. However, even though all waste has been removed from the regulated storage area, the area is not officially closed until a Certification of Closure has been completed by a certified professional engineer and approved by IEPA. Therefore, until such time, Edwardsville is still required to comply with the storage requirements.

You are hereby requested to submit within (30) days from the date of this letter a written description of actions taken to correct the aforementioned violations and to indicate what measures have been initiated to assure future compliance. Failure to correct the violations may subject the facility to further Federal enforcement action.

If you have any questions, please feel free to contact Ms. Barbara Russell of my staff at (312) 353-7922.

Sincerely yours,

Joseph M. Boyle, Chief
RCRA Enforcement Branch

Enclosure

cc: William Radlinski, IEPA
Glen Savage, IEPA

B.RUSSELL:ev:11/08/93:DISK #:FILENAME:edwardsville 11/18/93

SIGNATURE/INITIAL CONCURRENCE REQUESTED - RCRA ENFORCEMENT BRANCH (REB)									
TYP.	AUTH	IL/IN TES CHIEF	MI/WI TES CHIEF	MN/OH TES CHIEF	IL/MI/WI EPS CHIEF	IN/MN/OH EPS CHIEF	REB BRANCH CHIEF	RCRA ASSOC. DIR.	WMD DIVISION DIRECTOR
11-16-93	11/10/93				11-16-93		11/19/93		

COMPLIANCE MONITORING & ENFORCEMENT (CME) FORM

Date Submitted: 05/13/94 Submitted by: Clerk page __ of __

Date Entered: __/__/__ Data Entry by: _____

HANDLER INFORMATION

EPA I.D.#: IL D 0 0 6 3 3 1 3 4 2 T

HANDLER NAME: Southern IL University Edwardsvle

HANDLER ADDRESS: _____
Street City State

EVALUATION INFORMATION Add __ Change __ Delete __

DATE: 11/18/93 (MM DD YY) Resp. Agency: E Sequence Number: __ __ __

E-EPA S-State X-Oversight C-EPA Contractor B-State Contractor

EVALUATION TYPE: C E I Resp. Branch: __ __ Resp. Person: __ __ __

CEI-Compliance Evaluation Inspection; CAO-Corrective Action Inspection; CDI-Case Development Inspection; CME-Compliance Monitoring Evaluation
OAM-Operation & Maintenance; LBN-Land Ban Evaluation; CSE-Compliance Schedule Evaluation; FRR-Financial Record Review
OTH-Other (circle reason code); NRR-Non-Financial Record Review; SPL-Sampling Inspection

REASON FOR EVALUATION (optional except for OTH inspection): ___ ___

01-Follow-up; 05-TSD Withdrawal; 09-Remote Transport Inspection; 13-Multi-Media Inspection; 23-Multi-Media/RIP-Flex
02-Case Develop; 06-Closure; 10-RIP-Flex; 14-Import/Export; 24-Multi-Media/Great Lakes Init.
03-Sampling; 07-Construction; 11-Great Lakes Initiative; 15-Focused Inspection (IN only)
04-Citizen Complaint; 08-Waste Oil; 12-Part B Review; 22-SE Mich/Saginaw Bay (MI only)

COVERAGE AREAS (circle codes for all areas evaluated):

Generator Requirements
GER All Requirements; GGR General; GLB Land Ban; GMR Manifest; GOR Other Requirements
GPT Pre-Transport; GRR Record Keeping; GSC Special Conditions; GSQ Small Quantity Generator

Transporter Requirements
TGR General; TMR Manifest; TOR Other Requirements; TRR All Requirements; TWD Discharge/Spill

TSD Requirements
DAE Air Emissions; DCH Chemical/Physical/Biological; DCL Closure/Post-Closure; DCP Contingency Plan
DFR Financial Requirements; DGS General Standards; DGW Groundwater Monitoring Requirements; DIN Incineration Requirements
DLB Land Ban Requirements; DLF Landfill Requirements; DLT Land Treatment Requirements; DMC Container Requirements
DMR Manifest Requirements; DOR Other Requirements (Implementer); DOT Other Requirements (Oversight); DPB Part B Application
DPC Permit Condition; DPP Preparedness/Prevention; DSI Surface Impoundment; DTC Toxicity Characteristic
DTR Tank Requirements; DTT Thermal Treatment Requirements; DWP Waste Pile Requirements

Other Requirements
BRR BIF Record Review; CAS Corrective Action Schedule; CSS Compliance Schedule Violation; FEA Formal Enforcement Agreement

Evaluation Comment: _____

VIOLATION INFORMATION Add __ Change __ Delete __

Agency: E Sequence Number: __ __ __
Resp. Branch: REB Resp. Person: __ __ __ Area: DOR
Class (1,2,Pending): P Priority (0-9): __
Regulation: _____ Regulation Type: __ __ (FR,FS,PC,SR,SS)

Date Determined: __/__/__ (mm,dd,yy)
Scheduled Compliance: __/__/____ (mm,dd,yyyy)
Actual Compliance: __/__/__ (mm,dd,yy)

Comment: _____

VIOLATION INFORMATION Add __ Change __ Delete __

Agency: __ Sequence Number: __ __ __ __

Resp. Branch: __ __ Resp. Person: __ __ __ Area: __ __ __

Class (1,2,Pending): ___ Priority (0-9): ___

Regulation: _____ Regulation Type: __ __ (FR,FS,PC,SR,SS)

Date Determined: __ /__ /__ (mm,dd,yy)

Scheduled Compliance: __ /__ /_____ (mm,dd,yyyy)

Actual Compliance: __ /__ /__ (mm,dd,yy)

Comment: _____

VIOLATION INFORMATION Add __ Change __ Delete __

Agency: __ Sequence Number: __ __ __ __

Resp. Branch: __ __ Resp. Person: __ __ __ Area: __ __ __

Class (1,2,Pending): ___ Priority (0-9): ___

Regulation: _____ Regulation Type: __ __ (FR,FS,PC,SR,SS)

Date Determined: __ /__ /__ (mm,dd,yy)

Scheduled Compliance: __ /__ /_____ (mm,dd,yyyy)

Actual Compliance: __ /__ /__ (mm,dd,yy)

Comment: _____

ENFORCEMENT INFORMATION

Agency: __ (E,S,X) Sequence Number: __ __ __

Add __ Change __ Delete __ Date Issued: __ /__ /__ (MM DD YY) Resp. Branch: __ __ Resp. Person: __ __ __

Enforcement Type (Circle one): Resp. Attorney: __ __ __ Docket #: __ __ __ __ __ __ __ __ __ __ __ __ __ __ __

085 Land Ban Referral to EPA	220 Initial 7003 Order	420 Referral to AG/DOJ (EPA only)
086 Draft Stipulation Agreement	230 Initial 3013 Order	430 Referral to City/District Attorney
098 DOJ Pre-Filing Negotiations	240 Initial 3008(H) Order	510 Civil Action Filed for Compliance
099 Draft Consent Decree	250 Non-Compliance Notice (Federal)	520 Civil Action Filed for Imminent Hazard
105 Interim Status Compliance Letter	310 Final 3008(A) Order	530 Civil Action Filed to Compel Compliance
110 Verbal Informal Warning	311 State 3008(A) Order	540 Civil Action/Interim Corrective Action Filed
115 Information Request Letter (3007)	313 Executed Stipulation Agrmnt	550 Civil Action Filed for Monetary Penalties
120 Written Informal (NOV)	315 Stipulated Penalty Coll-In	590 Combination of Civil Actions Filed
121 Letter of Warning/FBCL	320 Final 7003 Order	610 Consent Decree
122 Enforcement Notice Letter/NOV	330 Final 3013 Order	620 Final Judicial Order
123 Ten-Day Letter	340 Final 3008(H) Order	710 Criminal Action
210 Initial Complaint 3008(A)	345 State Equivalent [3008(H)] Correct. Action Order	810 State Referral to EPA
211 Forgiveable APO	350 Final Federal Facility Compliance Agreement	820 EPA Referral to State
212 Non-Forgiveable APO	360 CERCLA 106 Order	830 RCRA Referral to CERCLA
213 Combined Forgiveable/Non-Forgiveable Penalty Order	370 CERCLA 104 Order	850 Federal Facility Referred to HQ
	410 Referral to AG/DOJ (State only)	890 Combination of Active Referrals

POLLUTION PREVENTION INDICATORS	PENALTY INFORMATION
__ EAE (Environmental Auditing)	Penalty Assessed: $ _____ Settlement Amount: $ _____
__ EPE (Environmental Public Awareness)	Payments:
__ ERE (Environmental Restoration)	Date: __/__/__ Amount: $ _____ Date: __/__/__ Amount: $ _____
__ PPE (Pollution Prevention)	Date: __/__/__ Amount: $ _____ Date: __/__/__ Amount: $ _____
__ PRE (Pollution Reduction)	Date: __/__/__ Amount: $ _____ Date: __/__/__ Amount: $ _____

Enforcement Comment: _____

Form Revised 2/94, U.S. EPA - Region 5
Designed by: R.L.Griffin, Waste Management Division, Office of RCRA, Program Management Branch, Information Management Section

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

OCT 14 1993

REPLY TO THE ATTENTION OF:

MEMORANDUM

SUBJECT: Inspection Report for Southern Illinois University at Edwardsville, Illinois

FROM: Willie H. Harris, Chief
Central District Office (SC-10C)

TO: Paul Dimock, Chief
IL/MI/WI Enforcement Program Section (HRE-8J)

Attached hereto is the amended RCRA inspection report for Southern Illinois University at Edwardsville. This report incorporates the suggestions as provided by your office.

If you have any further questions concerning this report, please feel free to call me at 886-5500 or Mr. Gerry Golubski, the inspector for this facility at 886-1968.

Attachment

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

OCT 14 1993

REPLY TO THE ATTENTION OF:

MEMORANDUM

SUBJECT: RCRA Inspection at Southern Illinois University, Edwardsville, Illinois (ILD006331342) (AGD102:DI)

FROM: Gerald R. Golubski, Environmental Engineer
Central District Office (SC-10C)

TO: Joseph M. Boyle, Chief
RCRA Enforcement Branch (HRE-8J)

THRU: Willie H. Harris, Chief
Central District Office (SC-10C)

On January 22, 1993, a RCRA inspection was conducted at this state owned and operated University. This inspection was pursuant to your office's request for inspections during FY'93. The University was represented by Mr. David E. McDonald, Coordinator for Environmental Control. The Illinois EPA was represented by Mr. Chris Cahnovsky, Environmental Protection Specialist from the Collinsville, Illinois office.

Background

Historically, most of the hazardous wastes generated on campus occurred within the Science Building. Due to both teaching and research activities, a wide variety of liquid and solid wastes were generated. In addition, several years ago, waste paints containing volatile solvents were also generated at the University's Physical Plant Building; however, that activity stopped when the University began using latex-type wall paints.

Typically, the wastes generated on campus were stored in either a storage room located on the first floor of the Science Building (SL0308), or treated within a dedicated laboratory within that same building (SL1209). The treatment was done on a batch feed basis normally involving only a few liters or grams per reaction. This treatment involved acid-base neutralization, destruction of functional inorganic groups (such as cyanides), or precipitation (i.e. metals) followed by decanting of solutions. Each treatment was documented and the residues were eventually labpacked for off-site disposal.

TSD Closure Activities

During the Fall of 1992, the University commenced closure activities of both the storage room (SL0308) and their RCRA Treatment Laboratory (SL1209). Under the direction of an independent professional engineer (Mr. Randall L. Patchett, IL License #62-046944), these two rooms were decontaminated after all hazardous wastes were removed. This decontamination event occurred on October 29, 1992. The work was performed by Chemical Waste Management - Remedial Services Group. SEC Donohue was "retained to provide (the) independent engineering oversight of the closure activities and to prepare and certify the Closure Documentation Report". That report is attached to this memorandum.

In summary, the report contains the final analytical results, on the final rinsate collected during the decontamination proceedings. Essentially, the results show almost no traces of organic or inorganic residues remaining in either room. Currently, this analytical information is being reviewed by the Illinois EPA. Once final closure has been approved, the University plans to operate solely as a small quantity generator. Any wastes generated on-site will be containerized (labpacked) and stored for less than 90 days in the former storage room (SL0308). However, until final closure has been approved, no hazardous waste will be stored in either the treatment laboratory or in the former storage room.

RCRA GENERATOR ACTIVITIES

Open Containers

As noted during previous U.S. EPA inspection and again during this most recent inspection, several open hazardous waste containers were observed within the Science Building. Specifically, three one gallon hazardous waste containers were stored open in Room 3211, and several open waste containers were noted in a fume hood in Room 3212. However, no open hazardous waste containers were observed in Rooms 2209, 2210, 2211, 2215, 2216, 2218, 3210C, or 3217B. It appears that the University is deficient in not properly managing hazardous wastes in containers as per Section 725.273.

Contingency Plan

Since the recent appointment of Mr. David E. McDonald as the Coordinator of Environmental Control, the University's Contingency Plan has been amended. At the time of this inspection, the amended plan was presented to this inspector for review. The plan identifies Mr. McDonald as the new emergency coordinator. The plan also lists his alternates. In addition, the plan identifies the Agencies who will be receiving the plan. These include SIU's Security Department, Edwardsville's Fire Department, SIU's Health Services Department, Olive C. Anderson hospital, and the Illinois EPA. However, it should be noted that this aforementioned plan was marked as a "Draft". As explained by Mr. McDonald, this plan will be fully implemented within a month when it is incorporated with the entire University's Contingency and Safety Plan. Therefore, until this plan is fully implemented, the University appears to be deficient in not making formal arrangements with local authorities as per Section 725.137.

Training

RCRA training records indicate that both Mr. David McDonald, and Mr. Sridhar Goshike received training in 1992. The training records indicate that they received training in Hazardous Materials and Hazardous Waste Handling. The records also show they received training in Hazard Communication Standards.

Although these training records indicate that the key hazardous wastes personnel on campus received training in 1992, no other training records were maintained. Specifically, the University's training records should also contain the names of teaching assistants, researchers and faculty members, who due to either teaching on research activities, will from time to time generate hazardous wastes. If this training were offered and documented, it may be possible that the University would no longer be deficient in storing hazardous wastes in open containers. This training should be offered at the beginning of each semester in order to ensure that no one is managing hazardous wastes in an improper manner.

Meanwhile it appears that the University is not properly providing RCRA training to individuals who generate Hazardous Wastes and therefore is deficient in Section 725.116.

Shipping Manifest

Upon examining RCRA shipping manifests for 1991 and 1992, no overdue shipping manifests were evident. Each manifest was signed, dated and returned in a timely manner. However, as noted during the inspection, there was a Land Ban deficiency in that there was not a Land Ban notification sheet within the files for RCRA shipping manifest IL3886279. Specifically, the University was deficient in Title 35 Part 728.107(a)(6)"..... Generators shall retain on-site a copy of all notices, certifications, demonstrations, waste analysis data, and other documentation produced pursuant to this section for at least five years from the date that the waste that is the subject of such documentation was last sent to on-site or off-site treatment storage or disposal."

Upon noting this deficiency, Mr. McDonald telephoned the disposal facility and requested a copy of that Land Ban Notification Sheet which accompanied the RCRA manifest. Subsequently, a copy of that Land Ban Notification was requested by this U.S. EPA inspector at the time of the inspection. As to date, that notification has not arrived. Instead, the University provided copies of Land Ban notification forms for other shipping manifests INA0717009 and INA0687554 (See attachment).

Summary

It appears that at the time of this RCRA inspection, the University was deficient in the following areas:

DEFICIENCY	EXPLANATION
1. Title 35 Section 725.273	Several open Hazardous Waste containers were observed inside the Science Building.
2. Title 35 Section 725.137	The University's Contingency Plan was not fully implemented at the time of the inspection.
3. Title 35 Section 725.116	Except for two individuals, the University does not provide RCRA training to generators of Hazardous Wastes on campus i.e. professors, teaching assistants, graduate students etc.
4. Title 35 Section 728.107 (a)(6)	Land Ban Notification Sheets were missing.

5.*
Attached is a completed Illinois EPA RCRA inspection checklist and Land Ban inspection checklist. Also provided is a copy of the University's closure report.

If you should have any questions regarding this inspection, please call me at 886-1968.

Attachments

5. Facility is also deficient in 725.274 and 725.115

6. Facility is also deficient in 722.134

Southern Illinois University at Edwardsville
Hazardous Waste Management
Box 1657
Edwardsville, Illinois 62026

Gerald R. Golubski, P.E.
U.S. Environmental Protection Agency
536 South Clark Street
Chicago, Illinois 60605

February 23, 1993

Subject: Inspection of Facility # ILD 006331342

Dear Mr. Golubski:

I have enclosed the information you requested during your inspection of January 22, 1993. Should you have any questions, please call me at (618) 692-3584.

Sincerely,

David E. McDonald
Coordinator for Environmental Control

enclosure

MAY 06 1992

HRE-8J

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. David E. McDonald
Coordinator for Environmental Control
Southern Illinois University at Edwardsville
Hazardous Waste Management Department
P.O. Box 1652
Edwardsville, Illinois 62026

Re: Notice of Violation
Southern Illinois University
(Edwardsville)
ILD 006 331 342

Dear Mr. McDonald:

On February 28, 1992, an inspection of Southern Illinois University (Edwardsville) was conducted by representatives of the United States Environmental Protection Agency (U.S. EPA). Under Section 3007 of the Resource Conservation and Recovery Act (RCRA) Federal Agencies have been granted the primary responsibility for ensuring the compliance of State facilities under their jurisdiction.

The purpose of the inspection was to determine if Southern Illinois University (Edwardsville) was in compliance with the State equivalent requirements of Subtitle C of RCRA as amended, 42 U.S.C. §6901 et seq. The State requirements are found at 35 Ill. Adm. Code Part 720 et seq. A copy of the inspection report is enclosed for your information.

As a result of the inspection, the following violations were identified:

1. Failure to identify contents and mark dates on all containers entering storage as required by 35 Ill. Adm. Code 722.134;

2. Failure to conduct and document weekly inspections of containers as required by 35 Ill. Adm. Code 725.274 and failure to inspect the facility for malfunctions and deterioration, operating errors, and discharges as required by 35 Ill. Adm. Code 725.115;

3. Failure to ensure that all personnel in the RCRA Management Program receive training as required by 35 Ill. Adm. Code 725.116; and

4. Failure to store all containers holding hazardous waste closed as required by 35 Ill. Adm. Code 725.273.

We have reviewed your letter dated March 9, 1992, to Mr. Gerald Golubski. That letter outlined the actions to be taken to correct the above-cited violations. However, U.S. EPA is requesting written documentation as well as photographic evidence be submitted certifying that all violations cited above have been corrected.

You are hereby requested to submit, within (30) days from the date of this letter the information requested above and also indicate the measures initiated to assure future compliance. Failure to correct the violations may subject the facility to further Federal enforcement action.

If you have any questions, please feel free to contact Barbara Russell of my staff at (312) 353-7922.

Sincerely yours,

ORIGINAL SIGNED BY
JOSEPH M. BOYLE

Joseph M. Boyle, Chief
RCRA Enforcement Branch

Enclosure

cc: William Radlinski, IEPA
Glen Savage, IEPA

RUSSELL:ev:04/24/92:DISK #:FILENAME:mcdonald

5/4/92

SIGNATURE/INITIAL CONCURRENCE REQUESTED - RCRA ENFORCEMENT BRANCH (REB)									
TYP.	AUTH	IL/IN TES CHIEF	MI/WI TES CHIEF	MN/OH TES CHIEF	IL/MI/WI EPS CHIEF	IN/MN/OH EPS CHIEF	REB BRANCH CHIEF	RCRA ASSOC. DIR.	WMD DIVISION DIRECTOR
	5/4/92				5-1-92		5/4/92		

B. Russell HRE-85

P 366 562 236

RECEIPT FOR CERTIFIED MAIL

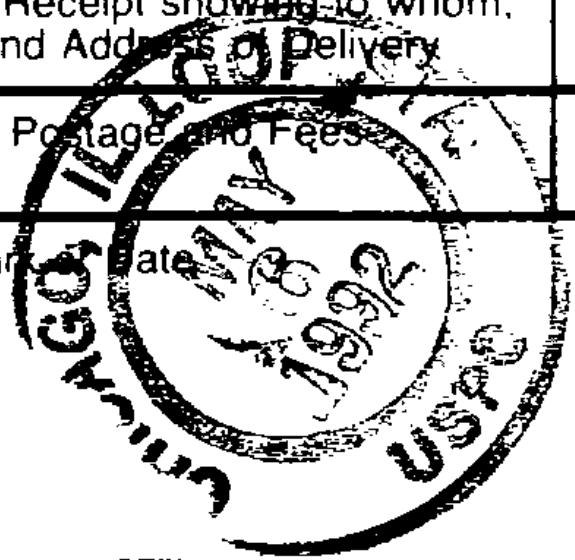
NO INSURANCE COVERAGE PROVIDED
NOT FOR INTERNATIONAL MAIL

(See Reverse)

Sent to David E. McDonald	
Street and No. P.O. Box 1652	
P.O., State and ZIP Code Edwardsville, IL 62026	
Postage	$ 4.10
Certified Fee	1.00
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt showing to whom and Date Delivered	1.00
Return Receipt showing to whom, Date, and Address of Delivery	
TOTAL Postage and Fees	$ 6.10
Postmark or Date	

☆U.S.G.P.O. 1989-234-555

PS Form 3800, June 1985



STICK POSTAGE STAMPS TO ARTICLE TO COVER FIRST CLASS POSTAGE, CERTIFIED MAIL FEE, AND CHARGES FOR ANY SELECTED OPTIONAL SERVICES. (see front)

1. If you want this receipt postmarked, stick the gummed stub to the right of the return address leaving the receipt attached and present the article at a post office service window or hand it to your rural carrier. (no extra charge)

2. If you do not want this receipt postmarked, stick the gummed stub to the right of the return address of the article, date, detach and retain the receipt, and mail the article.

3. If you want a return receipt, write the certified mail number and your name and address on a return receipt card, Form 3811, and attach it to the front of the article by means of the gummed ends if space permits. Otherwise, affix to back of article. Endorse front of article **RETURN RECEIPT REQUESTED** adjacent to the number.

4. If you want delivery restricted to the addressee, or to an authorized agent of the addressee, endorse **RESTRICTED DELIVERY** on the front of the article.

5. Enter fees for the services requested in the appropriate spaces on the front of this receipt. If return receipt is requested, check the applicable blocks in item 1 of Form 3811.

6. Save this receipt and present it if you make inquiry.

☆ U.S.G.P.O. 1989-234-555

SENDER: Complete items 1 and 2 when additional services are desired, and complete items 3 and 4.

Put your address in the "RETURN TO" Space on the reverse side. Failure to do this will prevent this card from being returned to you. The return receipt fee will provide you the name of the person delivered to and the date of delivery. For additional fees the following services are available. Consult postmaster for fees and check box(es) for additional service(s) requested.

1. ☐ Show to whom delivered, date, and addressee's address. *(Extra charge)*
2. ☐ Restricted Delivery *(Extra charge)*

3. Article Addressed to:

David E. McDonald
Coordinator for Environmental Ctrl.
Southern Illinois University at Edwardsville
Hazardous Waste Management Dept.
P.O. Bxo 1652
Edwardsville, IL 62026

4. Article Number

P 366 562 236

Type of Service:

☐ Registered ☐ Insured
☒ Certified ☐ COD
☐ Express Mail

Always obtain signature of addressee or agent and DATE DELIVERED.

5. Signature — Addressee

X

6. Signature — Agent

X Marjorie Calhoun

7. Date of Delivery

5/11/92

8. Addressee's Address *(ONLY if requested and fee paid)*

PS Form **3811**, Mar. 1987 * U.S.G.P.O. 1987-178-268 **DOMESTIC RETURN RECEIPT**

UNITED STATES POSTAL SERVICE

OFFICIAL BUSINESS

SENDER INSTRUCTIONS

Print your name, address, and ZIP Code in the space below.

- Complete items 1, 2, 3, and 4 on the reverse.
- Attach to front of article if space permits, otherwise affix to back of article.
- Endorse article "Return Receipt Requested" adjacent to number.

U.S.MAIL

PENALTY FOR PRIVATE USE, $300

RETURN TO

Print Sender's name, address, and ZIP Code in the space below.

Barbara Russell HRE-8J

UNITED STATES ENVIRONMENTAL
PROTECTION AGENCY REGION V
77 WEST JACKSON, BLVD.
CHICAGO, ILLINOIS 60604

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

MAR 2 6 1992

REPLY TO THE ATTENTION OF:

MEMORANDUM

SUBJECT: RCRA Inspection at Southern Illinois University, Edwardsville, Illinois (ILD006331342) (AGD102:04)

FROM: Gerald R. Golubski, Environmental Engineer
Central District Office (SC-9C)

TO: Joseph M. Boyle, Chief
RCRA Enforcement Branch (HRE-8J)

THRU: Willie H. Harris, Chief
Central District Office (SC-9C)

On February 28, 1992, a RCRA inspection was conducted at this State operated University. This inspection was pursuant to your office's request for inspections during FY'92. The University was represented by Mr. David E. McDonald, Coordinator for Environmental Control. Federal credentials were shown to him at the initial point of contact.

The Illinois EPA was notified prior to this inspection, however, they did not participate.

Background

Hazardous waste generated on campus are mostly from teaching and research activities that occur within the Science Building. However, in the past small quantities of waste paints and waste solvents that were used in cleaning typewriters were also generated, but, these points of generation have now been discontinued. Currently, the physical plant (maintenance operations) uses latex house paints instead of solvent/oil type paints. Moreover, with the wide scale use of computers, the University no longer maintains typewriters.

The Laboratory wastes generated in the Science Building consists of both chlorinated and non-chlorinated solvents (F solvents), waste corrosives (acids and bases) and minor amounts of heavy metals (precipitates). Generally, these wastes are transferred from small Lab containers (usually less than one gallon) into larger 5 gallon or even up to a 55 gallon drum. These drums are ultimately manifested offsite for disposal.

In addition to the offsite shipments of solvents and heavy metals, graduate chemistry students also performed routine treatment of wastes generated in the Science Building. These include elemental neutralization of acids and alkalies (bases), oxidation and destruction of organic functional groups (to render them less toxic) distillation of solvents and metals precipitation. This treatment is performed on a bench scale basis. Usually the graduate chemist mix a few liters or grams of wastes during each operation. A complete record of each treatment activity is maintained by these graduate chemistry students. Records are kept in a logbook as well as entered into a personnel computer. These reactions are well defined since the graduate students are working with waste materials from known teaching and research experiments.

Once the treatment is completed, the organics are placed in five gallon containers and brought to the University's TSD storage area (Room 0308) which is also located in the Science Building. Any supernate from metals precipitation as well as aqueous salt solutions from acid base neutralization is poured down a Lab sink (provided the pH is nearly neutral).

TSD Storage Room

Hazardous wastes are removed to the storage room each week. The RCRA storage area is located in the back of the chemical storage area (see attached Hazardous Waste Management Program Plan).

At the time of this EPA inspection only two 55 gallon drums of hazardous wastes and a few shelves of waste chemicals were in storage. Upon examining the drums it was apparent that they both had hazardous waste labels affixed, however, they were not completed. The labels lacked RCRA identification numbers, the waste classification and the name of the generator. In addition, neither drum had a fill date as to when wastes were poured inside. Moreover, a complete record (inventory) of wastes stored inside the drum was not maintained.

The waste chemicals on the storage shelves usually consist of known chemical reagents that have exceeded their respected shelve life. Thus, they are easily identifiable. Other smaller amounts of Lab waste were labeled by the individual experimenter as to what was inside each container. At the time of this inspection (February 28, 1992) approximately a single 55 gallon Lab pack container would hold all the excess waste that was located on these shelves.

During the time of this inspection, neither of the two 55 gallon drum showed signs of a release (leak) nor was there any visible evidence that a release occurred on any of the shelves holding expired chemicals.

Weekly Inspections

At the time of this U.S. EPA inspection, the University had recently reorganized its Hazardous Waste Program. As a result, Dr. Anthony Wilbraham, a chemistry professor who had managed the program for the last several years was replaced by Mr. David E. McDonald who is assigned to the newly created Hazardous Waste Management Department. As a consequence of this action there were some transitional record keeping practices ambiguities in the program. Specifically, at the time of the inspection, Mr. McDonald could not readily locate weekly inspection records. In addition, he was also unable to locate individual RCRA training records of students who were working for the chemistry department (please note that Dr. Wilbraham was not on campus during this unannounced inspection).

In a letter sent by Mr. McDonald on March 9, 1992 to my office, he was able to locate some records but there appeared to be a six month "gap" in record keeping for the weekly container storage area (Item #4). This deficiency occurred during the first half of 1991 and continued periodically during the last six months of the year (see attached documented Weekly Drum Inspection Log). In addition to these logs, the chemistry students also complete a Daily Safety Equipment and Facility Inspection Log in the Science Laboratory room (where the bench top RCRA treatment of wastes occurs). However, these daily records only go back to July of 1991. Again, documentation for the first half of 1991 is missing.

Thus it appears the University was deficient in the RCRA requirements for documenting weekly inspections during 1991.

RCRA Training

At the time of this inspection a few RCRA training files were located and reviewed. Specifically, these files indicated that graduate chemistry students ZHoe Ming, Tim Cooper, and Joe Wilson had received some RCRA Training in 1991. However, these records indicated that both Mr. Ming and Mr. Cooper received training in Emergency Response procedures (October 3, 1991), but Mr. Wilson had not. Since Mr. McDonald was recently assigned the duties as coordinator for Environmental Control it was uncertain at the time if those training records are complete. As explained by Mr. McDonald in his letter to us on March 9, 1992 he plans to remedy this deficiency immediately (Item #2).

Thus, it appears that the University was also deficient in the RCRA training requirements at the time of this U.S. EPA inspection.

Waste Minimization

Since most of the wastes on site comes from the Science Building, the chemistry department has made some efforts in reducing the amount of wastes it generates. Beginning in the Fall of 1992, they plan to implement a micro-analytical chemistry program to their students. This program instruction allows students to complete various Laboratory experiments however, the quantities of reagents and solvents is greatly reduced. As explained by Dr. Emil Jason, Chairperson for the Chemistry Department this micro-analytical teaching format has been used successfully in other midwestern University's in recent years.

In addition to these efforts, Mr. McDonald plans to prepare a detailed list of reagent chemicals available on a Waste Exchange List with the Illinois EPA. This may be practical since many of the waste chemicals stored in the storage room were in glass jars that have never been opened, or that their contents were used very sparingly.

Science Building Inspection

Since the majority of the hazardous wastes are generated within the Science Building, each collection area was examined by this U.S. EPA inspector. In summary, the following observations were made within each Laboratory classroom.

Room 2209

Although, no open waste containers were observed, the wastes in storage had no accumulation dates.

Room 2210

Although, no open waste containers were observed, the wastes in storage had no accumulation dates.

Room 2212

This Laboratory had open containers of waste chemicals. In addition, these containers had no accumulation date.

Room 2215

This Laboratory had open containers of waste hydrogen peroxide, sulfuric acid, and acetate buffer solutions. In addition, there were no accumulation dates on any containers.

2216

No open containers were evident and the waste containers were properly labeled.

2218

No open containers were evident and the waste containers were properly labeled.

3218

No wastes what-so-ever were stored in this Biology Lab.

3215

An open container of low level radioactive P_{32} was located in this Lab at the time of this inspection.

3212

A waste container was stored open within this Lab at the time of this inspection.

3210

A waste container was stored open within this Lab at the time of this inspection.

Physical Plant

The physical plant consist of several workshops that include auto, paint, machine, carpentry, and electrical shops. As previously mentioned these shops had generated waste cleaning solvents from their typewriter repair operation and from their paint shop. However, since the University is in the process of replacing all typewriters on campus with computers, this operation is now contracted to a vendor offsite. Moreover, since the paint shop now uses latex wallpaints exclusively they no longer generate oil base paints and cleaning solvents. However, as witnessed by this U.S. EPA inspector, the paint shop still maintains an accumulation drum on site in the event such wastes are ever generated (see photographs 1 and 2). At the time of this inspection, an empty drum was labeled and stored closed for this purpose. According to University records no solvent base paints were stored in the paint shop since last summer (1991).

Upon further inspection of the physical plant building several shop personnel were interviewed. Essentially, they explained that they no longer generated any hazardous wastes, although they did admit that they have a recycler who periodically collects waste crankcase oils from the autoshop. These oils are normally stored in 55 gallon drums on their service dock (See Photograph #3). Currently, Gateway Petroleum of Belleville, Illinois 62223 pays the University for these crankcase oils. According to the autoshop foreman, they generate approximately one dozen 55 gallon drums of motor oils each year.

In respect to other motor fluids such as radiator coolants (glycols) and battery acids, these operations are performed off campus at a local automobile service stations.

The only solvent used in the autoshop is located in a parts cleaning station which contains a degreasing solvent which is routinely replaced by Safety-Kleen. At the time of the inspection, the parts washer was closed.

Manifests

Since last years U.S. EPA inspection (February 15, 1991) there have been four offsite shipments of hazardous wastes. Copies of each manifests is attached to this report. In summary, these manifests appear to be in order.

Annual Report

Attached is a copy of the facility's latest RCRA Annual Report (1991). The report details the amounts generated and shipped offsite to various RCRA TSD facilities.

Closure

At the present time, the University is in the process of changing its RCRA status from a TSD to a RCRA generator. University officials believe this change is desirable since they would be relieved from the additional cost of maintaining a RCRA TSD facility when in fact they were only a small quantity generator. Upon examining the RCRA manifests for 1991 it appears that the University only generated 480 gallons of RCRA regulated wasted during the entire year (approximately 40 gallons per month). A small quantity generator in Illinois is a facility which would generate less than 265 gallons of Hazardous Wastes per month.

Attached to this inspection report is a copy of the University's "Closure Plan for the Hazardous Waste Management Program" revised December 20, 1991. This document is reportedly going to be followed in order to complete the TSD RCRA closure activities on campus. The closure "steps" are presented on page 8 of this report. The actual schedule of closure activities are listed on page 11.

PRC Site Visit

On January 8, 1992 representatives of PRC Inc. conducted an on site review of the RCRA storage areas at SIU. This inspection was in response to the U.S. EPA request for inspections for facility's who filed as TSD's in their Part A Application, but, have not filed or plan to file a Part B.

In summary, the PRC representatives did not believe that the storage areas are a current threat to the environment. If you need any further clarification on this matter, please call Ms. Lorraine T. Morris, Environmental Scientist at PRC. Her telephone number is (312) 856-8700.

Attached are copies and photographs as described in this narrative report. Also provided is a copy of the Illinois EPA RCRA Checklists, a LDR and TC Checklist as requested by your branch.

If you have any questions regarding this report, please call me at 886-1968.

Attachments

Southern Illinois University

February 28, 1992

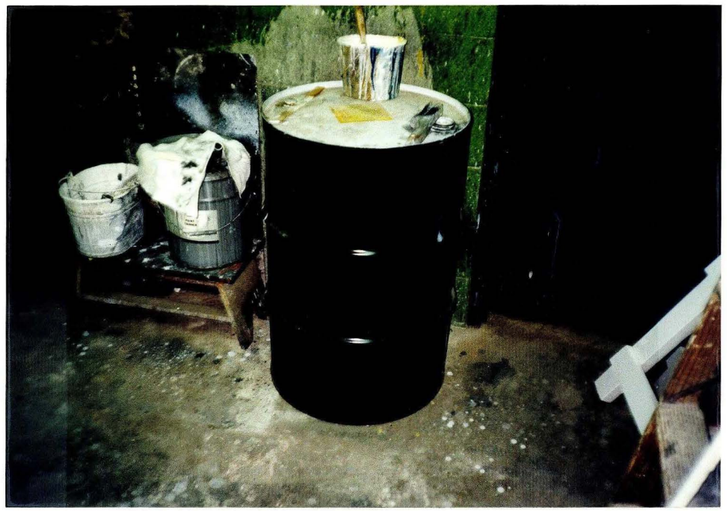


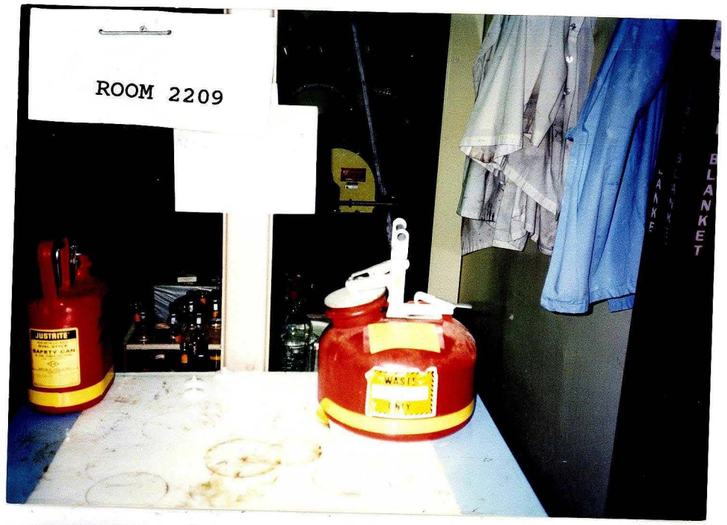
Photo #1 Empty Hazardous Waste Drum Located in the Physical Plant Building (Paint Shop)

Photo #2 Same Drum Showing Hazardous Waste Label and that the Drum is stored closed

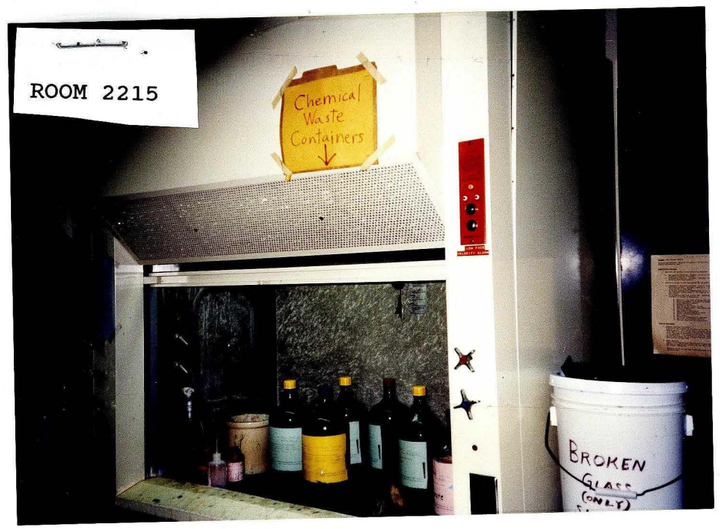
Southern Illinois University

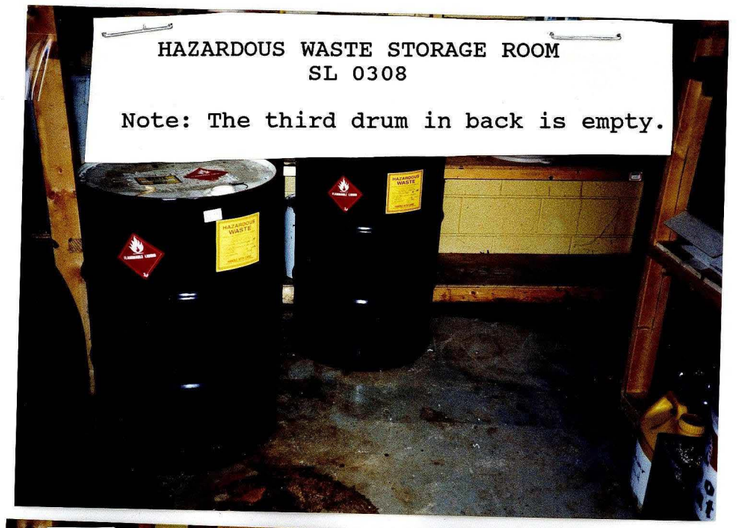
February 28, 1992

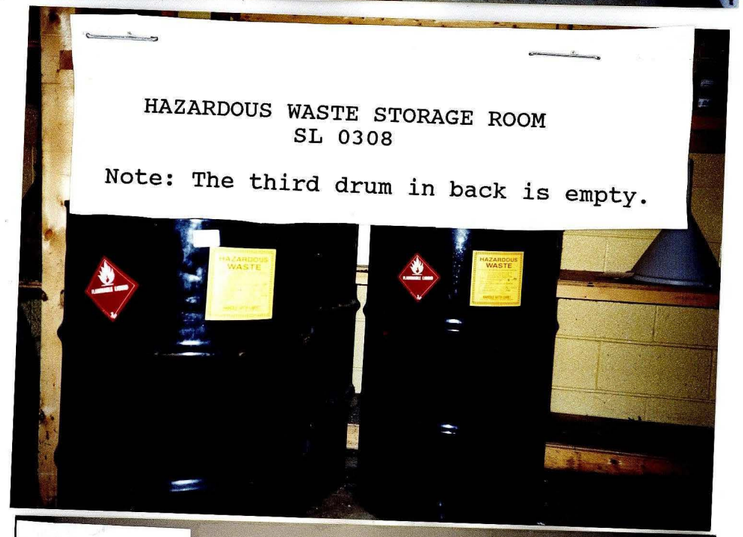
Photo #3 Several Drums of Waste Motor Oil on a outside dock at the Physical Plant. The oil in those drums are picked up periodically by a petroleum recyler.

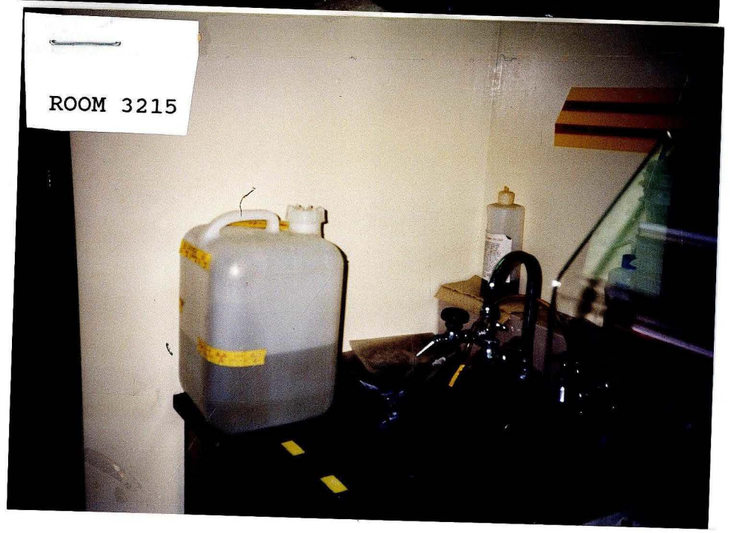

ROOM 2209
JUSTRITE
SAFETY CAN
WASTE
BLANKET


ROOM 2215


ROOM 2215
Chemical Waste Containers
BROKEN GLASS (ONLY)


HAZARDOUS WASTE STORAGE ROOM
SL 0308
Note: The third drum in back is empty.


HAZARDOUS WASTE STORAGE ROOM
SL 0308
Note: The third drum in back is empty.
HAZARDOUS WASTE
HAZARDOUS WASTE


ROOM 3215

Southern Illinois University at Edwardsville
Hazardous Waste Management Department

February 27, 1992

Illinois Environmental Protection Agency
Division of Land Pollution Control #24
P.O. Box 19276
Springfield, IL 62794-9276

Dear Sir/Madam:

RE: Generator/Facility USEPA # ILD006331342

Southern Illinois University at Edwardsville (SIUE) has enclosed the 1991 Hazardous Waste Report for the generator/facility number listed above. Both Form IC - "Identification and Certification" and Form GM - "Waste Generation and Management" have been completed and attached in accordance with Illinois Environmental Protection Agency regulations.

If you have any questions concerning this report, please call me at (618) 692-3584 or Dr. Wilbraham, Director of Hazardous Waste at (618) 692-3562.

Sincerely,

David E. McDonald
Coordinator for Environmental Control

cc.: Robert Vanzo, Assistant to the Vice President for Administration

ILD006331342 1190255002
SIU-SCIENCE BLDG
P.O. BOX 1652
EDWARDSVILLE, IL 62026

ILLINOIS Environmental Protection Agency
1991 Hazardous Waste Report
Form IC -- Identification and Certification

Instructions for this form found on pages 6 - 12.
This form must be completed for the location shown on the above label. If you need additional forms for other locations, call IEPA.

FOR AGENCY USE
___ IC
___ Others
___ Edit Letter
___ Corrected

Sec. I -- Generator Status

A. RCRA Generator Status *(Enter one code)*

30 2 1 = LQG
2 = SQG Skip to Box C
3 = CESQG
4 = Nongenerator (Continue to Box B)

B. Reason for not generating *(Check all that apply)*

31 ___ Never generated
32 ___ Out of business
33 ___ Only excluded or delisted waste generated
34 ___ Only non-hazardous waste generated
35 ___ Periodic generator, none in reporting year
36 ___ Waste minimization activity
37 ___ Other *(Specify in comments box)*

C. 38 1 1 = Status is expected to be the same next year and following years. 2 = Status is expected to change next year.

Section II. Enter the SIC Code(s) for this location.

39 8221 43 _____ 47 _____ 51 _____

Section III. On-Site Waste Management Status *(enter one code for each question)*

A. 55 3 RCRA regulated (permitted or interim status) storage
B. 56 1 RCRA permitted or interim status treatment, disposal, or recycling
C. 57 3 RCRA exempt treatment, disposal, or recycling

Section IV. Waste minimization activity during this reporting year *(Enter Y [Yes] or N [No] for questions A-D)*

A. 58 N Did this site begin or expand a **source reduction** activity this year?
B. 59 N Did this site begin or expand a **recycling** activity this year?
C. 60 Y Did this site systematically investigate opportunities for **source reduction or recycling**?
D. Did any of the factors listed below delay or limit this site's ability to initiate new or additional **source reduction** or on-site or off-site **recycling** activities this year; if yes, enter Y below.

	S. Reduc.		Recyc.	
61	Y	71	___	Insufficient capital to install new source reduction equipment or implement new source reduction practices
62	___	72	___	Lack of technical information on techniques applicable to the specific production processes
63	___	73	___	Not ecomomically feasible: cost savings in waste management or production will not recover the capital investment
64	___	74	___	Concern that product quality may decline as a result
65	___	75	___	Permitting burdens
66	___	76	___	Previously implemented -- additional reduction/recycling does not appear to be technically feasible
67	___	77	___	Previously implemented -- additional reduction/recycling does not appear to be economically feasible
68	___	78	___	Previously implemented -- additional reduction/recycling does not appear to be feasible due to permitting requirements
69	___			Technical limitations of the production processes
		79	___	Requirements to manifest wastes inhibit shipments off site for recycling
		80	___	Financial liability provisions inhibit shipments off site for recycling
		81	___	Technical limitations of production processes inhibit shipments off site for recycling
		82	___	Technical limitations of production processes inhibit off-site recycling
		83	___	Lack of permitted off-site recycling facilities
		84	___	Unable to identify a market for recyclable materials
70	___	85	___	Other *(Specify in Comments box)*

Sec. V. This Agency is authorized to require this information under Revised Statutes, 1981, Chapter III-1/2, Sections 1004 and 1021 (f)(2). Disclosure of this information in required. Failure to do may result in a civil penalty up to $25,999 for each day the failure continues, a fine up to $1,000,000.00 and imprisonment up to 5 years. This form has been approved by the Forms Management

CERTIFICATION I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate and complete. I am aware that there are significant penalti false information, including the possibility of fine and imprisonment.

A. Please print: Last Name McDonald First Name David B. Title Coordinator for Env. Cont

C. Signature David McDonald D. Date of signature 2-27-92

COMMENTS: ___ (86) Enter Y (Yes) if you have comments regarding this page and attach extra sheet.

S.U-SCIENCE BLDG
P.O. BOX 1652
EDWARDSVILLE, IL 62026

ILLINOIS Environmental Protection Agency
1991 Hazardous Waste Report
Form GM -- Waste Generation and Management

Instructions for this form found on pages 14 - 31.

Sec. I WASTE DESCRIPTION

A. Waste Description: Waste Flammable Liquid; Methylene Chloride and Benzene
B. EPA Hazardous Waste Code (30) F 0 0 2 (34) ____ (38) ____ (42) ____ (46) ____
C. SIC code (50) 8 2 2 1
D. Origin Code (54) 1 System type (55) M ____ E. Source code (59) A 9 4 (62) A ____ (65) A ____
F. Point of measurement (68) 1 G. Form code (69) B 2 0 4
H. Radioactive mixed (73) 2 I. TRI constituent (74) 1
J. CAS numbers: 1. (75) ____-____-__ 2. (83) ____-____-__ 3. (91) ____-____-__
4. (99) ____-____-__ 5. (107) ____-____-__

Sec. II QUANTITY GENERATED AND MANAGED ON-SITE

A. UOM (115) 1 Density (116) 8.30 lbs/gal *(Same unit and density must be used for all quantities on this page)*
B. Quantity generated in previous reporting year (120) N A. C. Current reporting year (130) 2 2 0 0.0
D. Did this location do any of the following to this waste (at this location): manage in exempt or regulated treatment, recycling, or disposal process? (140) N Y= Yes (Continue to System 1) N= No (Skip to Sec. III)
On-Site System 1: System Type (141) M ____ Quantity managed on-site this year (145) ____.__
On-Site System 2: System Type (155) M ____ Quantity managed on-site this year (159) ____.__

Sec. III OFF-SITE SHIPMENT

A. Was any of this waste shipped off site this reporting year? (169) Y Y= Yes (Continue to Box B) N= No (Skip to Sec. IV)
Site 1: Name and address of facility:
Rineco Chemical Industries
1007 Vulcan Road - Haskell
Benton, AR 72015
B. U.S. EPA ID No. of facility waste was shipped to: (170) A R D 9 8 1 0 5 7 8 7 0
C. System type shipped to (182) M 0 4 1 D. Off-site availability code (186) 1
E. Total quantity shipped in this reporting year: (187) 2 2 0 . 0
Site 2: Name and address of facility:

B. U.S. EPA ID No. of facility waste was shipped to: (197) ____
C. System type shipped to (209) M ____ D. Off-site availability code (213) ____
E. Total quantity shipped in this reporting year: (214) ____.__

Sec. IV NEW WASTE MINIMIZATION ACTIVITIES

A. Did new activities in this year result in minimization of this waste? (224) N Y= Yes (Cont. to Box B) N= No (Cont. to Sec. V)
B. Activity (225) W ____ (228) W ____ (231) W ____ (234) W ____ C. Other effects (Y=Yes, N=No) (237) ____
D. Quantity recycled in reporting year due to new activities (238) ____.__
E. Activity/production index (248) ____.__ F. Reporting year Source reduction quantity (251) ____.__

Sec. V REGULATED STORAGE

A. Did this site store RCRA wastes 90 days and then ship it off-site (to site shown in Section III)? (Y=Yes, N=No) (261) Y
B. Did this site store RCRA wastes on-site for more than 90 days but waste is in storage at year end: (Y= Yes, N= No) (262) N
Quantity stored that was generated this reporting year: (263) ____.__
Quantity stored that was generated prior to this reporting year: (273) ____.__

COMMENTS: (283) ____ Enter Y (Yes) if you have comments regarding this page and attach extra sheet.

SIU-SCIENCE BLDG
P.O. BOX 1652
EDWARDSVILLE, IL 62026

ILLINOIS Environmental Protection Agency
1991 Hazardous Waste Report
Form GM – Waste Generation and Managemen

Instructions for this form found on pages 14 - 31.

Sec. I WASTE DESCRIPTION

A. Waste Description: Waste Flammable Liquid; Flammable Liquid (Pyridine)
B. EPA Hazardous Waste Code F005 (30) D007 (34) (38) (42) (46)
C. SIC code 8221 (50)
D. Origin Code 1 (54) System type M (55) E. Source code A94 (59) A (62) A (65)
F. Point of measurement 1 (68) G. Form code B219 (69)
H. Radioactive mixed 2 (73) I. TRI constituent 1 (74)
J. CAS numbers: 1. (75) 2. (83) 3. (91)
4. (99) 5. (107)

Sec. II QUANTITY GENERATED AND MANAGED ON-SITE

A. UOM 1 (115) Density 8.3 (116) lbs/gal *(Same unit and density must be used for all quantities on this page)*
B. Quantity generated in previous reporting year NA. (120) C. Current reporting year 1 (130).
D. Did this location do any of the following to this waste (at this location): manage in exempt or regulated treatment, recycling, or disposal process? N (140) Y= Yes (Continue to System 1) N= No (Skip to Sec. III)
On-Site System 1: System Type M (141) Quantity managed on-site this year (145).
On-Site System 2: System Type M (155) Quantity managed on-site this year (159).

Sec. III OFF-SITE SHIPMENT

A. Was any of this waste shipped off site this reporting year? Y (169) Y= Yes (Continue to Box B) N= No (Skip to Sec. IV)
Site 1: Name and address of facility: Environmentaal Enterprises, Inc.
4650 Spring Grove
Cincinnati, Ohio 45232
B. U.S. EPA ID No. of facility waste was shipped to: OHD083377010 (170)
C. System type shipped to M077 (182) D. Off-site availability code 1 (186)
E. Total quantity shipped in this reporting year: 1.0 (187)
Site 2: Name and address of facility:

B. U.S. EPA ID No. of facility waste was shipped to: (197)
C. System type shipped to M (209) D. Off-site availability code (213)
E. Total quantity shipped in this reporting year: (214)

Sec. IV NEW WASTE MINIMIZATION ACTIVITIES

A. Did new activities in this year result in minimization of this waste? N (224) Y= Yes (Cont. to Box B) N= No (Cont. to Sec. V)
B. Activity W (225) W (228) W (231) W (234) C. Other effects (Y=Yes, N=No) (237)
D. Quantity recycled in reporting year due to new activities (238)
E. Activity/production index (248) F. Reporting year Source reduction quantity (251)

Sec. V REGULATED STORAGE

A. Did this site store RCRA wastes 90 days and then ship it off-site (to site shown in Section III)? (Y=Yes, N=No) N (261)
B. Did this site store RCRA wastes on-site for more than 90 days but waste is in storage at year end: (Y= Yes, N= No) N (262)
Quantity stored that was generated this reporting year: (263)
Quantity stored that was generated prior to this reporting year: (273)

COMMENTS: (283) Enter Y (Yes) if you have comments regarding this page and attach extra sheet.

SIU-SCIENCE BLDG
P.O. BOX 1652
EDWARDSVILLE, IL 62026

ILLINOIS Environmental Protection Agency
1991 Hazardous Waste Report
Form GM – Waste Generation and Management

Instructions for this form found on pages 14 - 31.

Sec. I WASTE DESCRIPTION

A. Waste Description: Waste Flammable Liquid; Acetone and Alcohol
B. EPA Hazardous Waste Code F003 (30) ____ (34) ____ (38) ____ (42) ____ (46)
C. SIC code 8221 (50)
D. Origin Code 1 (54) System type M (55) ____ E. Source code A94 (59) A (62) ____ A (65) ____
F. Point of measurement 1 (68) G. Form code B203 (69)
H. Radioactive mixed 2 (73) I. TRI constituent 1 (74)
J. CAS numbers: 1. (75) ____ 2. (83) ____ 3. (91) ____
4. (99) ____ 5. (107) ____

Sec. II QUANTITY GENERATED AND MANAGED ON-SITE

A. UOM 1 (115) Density 8.3 (116) lbs/gal *(Same unit and density must be used for all quantities on this page)*
B. Quantity generated in previous reporting year (120) 2550 C. Current reporting year (130) 1650
D. Did this location do any of the following to this waste (at this location): manage in exempt or regulated treatment, recycling, or disposal process? N (140) Y= Yes (Continue to System 1) N= No (Skip to Sec. III)
On-Site System 1: System Type M (141) ____ Quantity managed on-site this year (145) ____
On-Site System 2: System Type M (155) ____ Quantity managed on-site this year (159) ____

Sec. III OFF-SITE SHIPMENT

A. Was any of this waste shipped off site this reporting year? Y (169) Y= Yes (Continue to Box B) N= No (Skip to Sec. IV)
Site 1: Name and address of facility:
Rineco Chemical Industries
1007 Vulcan Road- Haskell
Benton, AR 72015
B. U.S. EPA ID No. of facility waste was shipped to: AR0981057870 (170)
C. System type shipped to M041 (182) D. Off-site availability code 1 (186)
E. Total quantity shipped in this reporting year: (187) 1650

Site 2: Name and address of facility:

B. U.S. EPA ID No. of facility waste was shipped to: (197) ____
C. System type shipped to M (209) ____ D. Off-site availability code (213) ____
E. Total quantity shipped in this reporting year: (214) ____

Sec. IV NEW WASTE MINIMIZATION ACTIVITIES

A. Did new activities in this year result in minimization of this waste? N (224) Y= Yes (Cont. to Box B) N= No (Cont. to Sec. V)
B. Activity W (225) ____ W (228) ____ W (231) ____ W (234) ____ C. Other effects (Y=Yes, N=No) (237) ____
D. Quantity recycled in reporting year due to new activities (238) ____
E. Activity/production index (248) ____ F. Reporting year Source reduction quantity (251) ____

Sec. V REGULATED STORAGE

A. Did this site store RCRA wastes 90 days and then ship it off-site (to site shown in Section III)? (Y=Yes, N=No) Y (261)
B. Did this site store RCRA wastes on-site for more than 90 days but waste is in storage at year end: (Y= Yes, N= No) N (262)
Quantity stored that was generated this reporting year: (263) ____
Quantity stored that was generated prior to this reporting year: (273) ____

COMMENTS: (283) ____ Enter Y (Yes) if you have comments regarding this page and attach extra sheet.

SIU-SCIENCE BLDG
P.O. BOX 1652
EDWARDSVILLE, IL 62026

ILLINOIS Environmental Protection Agency
1991 Hazardous Waste Report
Form GM – Waste Generation and Management

Instructions for this form found on pages 14 - 31.

Sec. I WASTE DESCRIPTION

A. Waste Description: Waste Poisonous Solid; Poison B, Barium Salts
B. EPA Hazardous Waste Code D005 (30) D007 (34) D008 (38) D004 (42) D009 (46)
C. SIC code 8221 (50)
D. Origin Code 5 (54) System type M07 (55) E. Source code A04 (59) A___ (62) A___ (65)
F. Point of measurement 1 (68) G. Form code B316 (69)
H. Radioactive mixed 2 (73) I. TRI constituent 1 (74)
J. CAS numbers: 1. ___-___-___ (75) 2. ___-___-___ (83) 3. ___-___-___ (91)
4. ___-___-___ (99) 5. ___-___-___ (107)

Sec. II QUANTITY GENERATED AND MANAGED ON-SITE

A. UOM 1 (115) Density 1 (116) 0.50 lbs/gal *(Same unit and density must be used for all quantities on this page)*
B. Quantity generated in previous reporting year 200.0 (120) C. Current reporting year 12. (130)
D. Did this location do any of the following to this waste (at this location): manage in exempt or regulated treatment, recycling, or disposal process? N (140) Y= Yes (Continue to System 1) N= No (Skip to Sec. III)
On-Site System 1: System Type M (141) ___ Quantity managed on-site this year ___ (145)
On-Site System 2: System Type M (155) ___ Quantity managed on-site this year ___ (159)

Sec. III OFF-SITE SHIPMENT

A. Was any of this waste shipped off site this reporting year? Y (169) Y= Yes (Continue to Box B) N= No (Skip to Sec. IV)
Site 1: Name and address of facility:
Environmental Enterprises, Inc.
4650 Spring Grove
Cincinnati, Ohio 45232
B. U.S. EPA ID No. of facility waste was shipped to: OHD008337010 (170)
C. System type shipped to M077 (182) D. Off-site availability code 1 (186)
E. Total quantity shipped in this reporting year: 12.0 (187)
Site 2: Name and address of facility:

B. U.S. EPA ID No. of facility waste was shipped to: ___ (197)
C. System type shipped to M___ (209) D. Off-site availability code ___ (213)
E. Total quantity shipped in this reporting year: ___ (214)

Sec. IV NEW WASTE MINIMIZATION ACTIVITIES

A. Did new activities in this year result in minimization of this waste? N (224) Y= Yes (Cont. to Box B) N= No (Cont. to Sec. V)
B. Activity W___ (225) W___ (228) W___ (231) W___ (234) C. Other effects (Y=Yes, N=No) ___ (237)
D. Quantity recycled in reporting year due to new activities ___ (238)
E. Activity/production index ___ (248) F. Reporting year Source reduction quantity ___ (251)

Sec. V REGULATED STORAGE

A. Did this site store RCRA wastes 90 days and then ship it off-site (to site shown in Section III)? (Y=Yes, N=No) Y (261)
B. Did this site store RCRA wastes on-site for more than 90 days but waste is in storage at year end: (Y= Yes, N= No) Y (262)
Quantity stored that was generated this reporting year: 26.0 (263)
Quantity stored that was generated prior to this reporting year: 0.0 (273)

COMMENTS: ___ (283) Enter Y (Yes) if you have comments regarding this page and attach extra sheet.

SIU-SCIENCE BLDG
P.O. BOX 1652
EDWARDSVILLE, IL 62026

ILLINOIS Environmental Protection Agency
1991 Hazardous Waste Report
Form GM – Waste Generation and Management

Instructions for this form found on pages 14 - 31.

Sec. I WASTE DESCRIPTION

A. Waste Description: Acidic and Basic Liquid Waste
B. EPA Hazardous Waste Code D 0 0 2 (30) ____ (34) ____ (38) ____ (42) ____ (46) ____
C. SIC code 8 2 2 1 (50)
D. Origin Code 1 (54) System type M (55) ____ E. Source code A 9 4 (59) A ____ (62) A ____ (65)
F. Point of measurement 1 (68) G. Form code B 1 0 5 (69)
H. Radioactive mixed 2 (73) I. TRI constituent 1 (74)
J. CAS numbers: 1. ____ (75) 2. ____ (83) 3. ____ (91)
4. ____ (99) 5. ____ (107)

Sec. II QUANTITY GENERATED AND MANAGED ON-SITE

A. UOM 1 (115) Density 1 0 . 0 0 (116) lbs/gal *(Same unit and density must be used for all quantities on this page)*
B. Quantity generated in previous reporting year ____ 3 6 0 . 0 (120) C. Current reporting year ____ 3 2 0 . 0 (130)
D. Did this location do any of the following to this waste (at this location): manage in exempt or regulated treatment, recycling, or disposal process? Y (140) Y= Yes (Continue to System 1) N= No (Skip to Sec. III)
On-Site System 1: System Type M (141) 1 2 1 Quantity managed on-site this year ____ 3 2 0 . 0 (145)
On-Site System 2: System Type M (155) ____ Quantity managed on-site this year ____ (159)

Sec. III OFF-SITE SHIPMENT

A. Was any of this waste shipped off site this reporting year? N (169) Y= Yes (Continue to Box B) N= No (Skip to Sec. IV)
Site 1: Name and address of facility:

B. U.S. EPA ID No. of facility waste was shipped to: ____ (170)
C. System type shipped to M (182) ____ D. Off-site availability code ____ (186)
E. Total quantity shipped in this reporting year: ____ (187)
Site 2: Name and address of facility:

B. U.S. EPA ID No. of facility waste was shipped to: ____ (197)
C. System type shipped to M (209) ____ D. Off-site availability code ____ (213)
E. Total quantity shipped in this reporting year: ____ (214)

Sec. IV NEW WASTE MINIMIZATION ACTIVITIES

A. Did new activities in this year result in minimization of this waste? N (224) Y= Yes (Cont. to Box B) N= No (Cont. to Sec. V)
B. Activity W (225) ____ W (228) ____ W (231) ____ W (234) ____ C. Other effects (Y=Yes, N=No) ____ (237)
D. Quantity recycled in reporting year due to new activities ____ (238)
E. Activity/production index ____ (248) F. Reporting year Source reduction quantity ____ (251)

Sec. V REGULATED STORAGE

A. Did this site store RCRA wastes 90 days and then ship it off-site (to site shown in Section III)? (Y=Yes, N=No) N (261)
B. Did this site store RCRA wastes on-site for more than 90 days but waste is in storage at year end: (Y= Yes, N= No) N (262)
Quantity stored that was generated this reporting year: ____ (263)
Quantity stored that was generated prior to this reporting year: ____ (273)

COMMENTS: ____ (283) Enter Y (Yes) if you have comments regarding this page and attach extra sheet.

ILD006331342 1190255002
SIU-SCIENCE BLDG
P.O. BOX 1652
EDWARDSVILLE, IL 62026

ILLINOIS Environmental Protection Agency
1991 Hazardous Waste Report
Form GM – Waste Generation and Management

Instructions for this form found on pages 14 - 31.

Sec. I WASTE DESCRIPTION

A. Waste Description: Spent Acids with metals
B. EPA Hazardous Waste Code D004 (30) D005 (34) D007 (38) D008 (42) D009 (46)
C. SIC code 8221 (50)
D. Origin Code 1 (54) System type M (55)
E. Source code A94 (59) A (62) A (65)
F. Point of measurement 1 (68)
G. Form code B103 (69)
H. Radioactive mixed 2 (73)
I. TRI constituent 1 (74)
J. CAS numbers: 1. (75) 2. (83) 3. (91) 4. (99) 5. (107)

Sec. II QUANTITY GENERATED AND MANAGED ON-SITE

A. UOM 1 (115) Density 10.0 (116) lbs/gal *(Same unit and density must be used for all quantities on this page)*
B. Quantity generated in previous reporting year 350.0 (120) C. Current reporting year 3290 (130)
D. Did this location do any of the following to this waste (at this location): manage in exempt or regulated treatment, recycling, or disposal process? Y (140) Y= Yes (Continue to System 1) N= No (Skip to Sec. III)
On-Site System 1: System Type M079 (141) Quantity managed on-site this year 3290 (145)
On-Site System 2: System Type M (155) Quantity managed on-site this year (159)

Sec. III OFF-SITE SHIPMENT

A. Was any of this waste shipped off site this reporting year? N (169) Y= Yes (Continue to Box B) N= No (Skip to Sec. IV)
Site 1: Name and address of facility:

B. U.S. EPA ID No. of facility waste was shipped to: (170)
C. System type shipped to M (182) D. Off-site availability code (186)
E. Total quantity shipped in this reporting year: (187)
Site 2: Name and address of facility:

B. U.S. EPA ID No. of facility waste was shipped to: (197)
C. System type shipped to M (209) D. Off-site availability code (213)
E. Total quantity shipped in this reporting year: (214)

Sec. IV NEW WASTE MINIMIZATION ACTIVITIES

A. Did new activities in this year result in minimization of this waste? N (224) Y= Yes (Cont. to Box B) N= No (Cont. to Sec. V)
B. Activity W (225) W (228) W (231) W (234) C. Other effects (Y=Yes, N=No) (237)
D. Quantity recycled in reporting year due to new activities (238)
E. Activity/production index (248) F. Reporting year Source reduction quantity (251)

Sec. V REGULATED STORAGE

A. Did this site store RCRA wastes 90 days and then ship it off-site (to site shown in Section III)? (Y=Yes, N=No) N (261)
B. Did this site store RCRA wastes on-site for more than 90 days but waste is in storage at year end: (Y= Yes, N= No) N (262)
Quantity stored that was generated this reporting year: (263)
Quantity stored that was generated prior to this reporting year: (273)

COMMENTS: Y (283) Enter Y (Yes) if you have comments regarding this page and attach extra sheet.

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION V

DATE: FEB 1 9 1992

SUBJECT: Compliance Evaluation Inspection
SIU-Edwardsville (ILD 006 331 342)

FROM: Barbara Russell
IL/MI/WI Enforcement Program Section

TO: Gerald Golubski, Environmental Engineer
Central District Office (SC-9C)

THRU: Paul Dimock, Chief
IL/MI/WI Enforcement Program Section

Per a telephone conversation with J.P. Singh, Acting Chief and Paul Dimock, on February 11, 1992, I am submitting to you items that should be inspected and checked during the Compliance Evaluation Inspection (CEI) at the above referenced facility.

Southern Illinois University (Edwardsville) located in Edwardsville, Illinois notified U.S. EPA of its hazardous waste activity on January 12, 1987. SIU notified as a TSD of (F001, F002, F003, F004 and F005). SIU submitted a part A on April 18, 1987.

Our data system indicate that the last inspection conducted at the facility on February 15, 1991, was a CEI and was conducted by U.S. EPA and violations were found. These violations were corrected and considered resolved on May 9, 1991. The checklists listed below are necessary for the inspection. Please complete the following:

1. TSD
2. LDR
3. TC (attached)

At this time there are no checklist for the BIF and Air Emissions requirements, however these two (2) areas need to be checked for compliance. After checking the Enforcement compliance file, and our data system, it appears that there are no outstanding RCRA violations at this facility at this time.

If you have any questions please feel free to call me at 353-7922.

Attachment

B.RUSSELL:ev:02/13/92:DISK #:FILENAME:Compliance

SIGNATURE/INITIAL CONCURRENCE REQUESTED - RCRA ENFORCEMENT BRANCH (REB)									
TYP.	AUTH	IL/IN TES CHIEF	MI/WI TES CHIEF	MN/OH TES CHIEF	IL/MI/WI EPS CHIEF	IN/MN/OH EPS CHIEF	REB BRANCH CHIEF	RCRA ASSOC. DIR.	WMD DIVISION DIRECTOR

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION V

DATE: FEB 07 1992

SUBJECT: RCRA Compliance Evaluation Inspection Notification

FROM: J.P. Singh, Acting Chief
Central District Office (SC-9C) JPS

TO: Paul Dimock, Supervisor
Enforcement Program Section (HRE-8J)

Based on your memorandum of April 29, 1991, and subsequent telephone conversations with Willie H. Harris, a decision was made to have a premeeting between the Enforcement Program Section and the Central District Office (CDO) prior to a RCRA inspection. The purpose of the meeting is to ensure that RCRA's objectives will be met during the inspection.

CDO will be conducting two RCRA inspections during the week of February 24, 1992. The facilities include:

Fort Chartres State Park, IL (ILD981189348) SHARON TRAVIS
SIU-Edwardsville, IL (ILD00[illegible]331342) BARBARA RUSSELL

Please provide my office with the RCRA contact for this facility, so our staff members can arrange to meet to outline the scope of the inspection.

If you have any questions, please contact me at 353-9637 or Gerry Golubski of my staff at 886-1968.

cc: Joseph M. Boyle (HRE-8J)
Phyllis Reed (S-14J)

I CALLED J.P. SINGH AND INFORMED HIM OF THE RCRA CONTACTS. HE SUGGESTED THEY CALL GERRY G. AND INFORM HIM OF RCRA REQ. AND CONCERNS, PLD 2-10-92

BARBARA & SHARON PLEASE REVIEW FILES & CALL GERRY ON THE INSP. CHECKLISTS TO BE COMPLETED AND ANY OTHER RCRA CONCERNS WE MA HAVE PLD

JUN 17 1992

HRE-8J

Mr. David E. McDonald
Coordinator for Environmental Control
Southern Illinois University at Edwardsville
Hazardous Waste Management Department
P.O. Box 1657
Edwardsville, Illinois 62026

Re: Southern Illinois University
at Edwardsville
ILD 006 331 342

Dear Mr. McDonald:

The United States Environmental Protection Agency (U.S. EPA) has reviewed your letter received June 1, 1992. That letter documented actions taken by the above-referenced facility to correct violations identified in our Notice of Violation dated May 6, 1992. The actions stated in your letter adequately address the violations of 35 Ill. Adm. Code 722.134, 725.115, 725.116, and 725.273.

Your cooperation and efforts in this matter are greatly appreciated. Please feel free to contact Ms. Barbara Russell of my staff at (312) 353-7922, if you have any further questions.

Sincerely yours,

ORIGINAL SIGNED BY
JOSEPH M. BOYLE
Joseph M. Boyle, Chief
RCRA Enforcement Branch

cc: William Radlinski, IEPA
Glen Savage, IEPA
B.RUSSELL:ev:06/03/92:DISK #:FILENAME:southern

6/16/92

SIGNATURE/INITIAL CONCURRENCE REQUESTED - RCRA ENFORCEMENT BRANCH (REB)									
TYP.	AUTH	IL/IN TES CHIEF	MI/WI TES CHIEF	MN/OH TES CHIEF	IL/MI/WI EPS CHIEF	IN/MN/OH EPS CHIEF	REB BRANCH CHIEF	RCRA ASSOC. DIR.	WMD DIVISION DIRECTOR
6/15/92	6/15/92				6/16/92		6/16/92		

Southern Illinois University at Edwardsville
Hazardous Waste Management Department
Box 1657
Edwardsville, Illinois 62026

Attention: HRE-8J
Mr. Joseph Boyle, Chief
RCRA Enforcement Branch
United States Environmental Protection Agency
Region 5
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

Re: Notice of Violation
Southern Illinois University at Edwardsville
ILD 006 331 342

Dear Mr. Boyle:

In response to the Environmental Protection Agency (EPA) notice of violation (NOV) dated May 6, 1992, I am submitting the written documentation as well as photographic evidence that the violations have been corrected. The violations noted as a result of the February 28th inspection and Southern Illinois University at Edwardsville's (SIUE'S) response is provided below:

1. Failure to identify contents and mark dates on all containers entering storage as required by 35 Ill. Adm. Code 722.134; and

4. Failure to store all containers holding hazardous waste closed as required by 35 Ill. Adm. Code 725.273.

SIUE'S RESPONSE: Since the inspection of February 28th, 1992, the faculty and teaching assistants in the Department of Chemistry and Biology and the general assistants in the Hazardous Waste Management Department have been instructed to ensure that all containers at hazardous waste satellite accumulation areas are properly labeled and dated. The containers in the following satellite accumulation areas are closed, labeled properly, and include the start date of accumulation:

SL 2209- Chemistry Department
SL 2210- Chemistry Department
SL 2212- Chemistry Department
SL 2215- Chemistry Department
SL 2216- Chemistry Department
SL 2218- Chemistry Department
SL 3218- Biology Department
SL 3215- Biology Department
SL 3212- Biology Department
SL 3210 A,B, & C- Biology Department

I have included photographs of the laboratories where

violations were noted if hazardous waste containers were present. No waste containers were present in rooms SL 3212 and SL 3210 A, B & C.

The Hazardous Waste Management Department is currently coordinating with the University Sign Service to design permanent signs to be placed in the satellite accumulation areas. The proposed signs will be placed in the laboratories to remind teaching assistants, faculty and students to properly label and mark the accumulation dates on all waste containers. The sign will also explain that all containers must be closed except when filling. The language on the signs, when completed, will be similar to the notice included in my initial response to Mr. Gerald Golubski, EPA, dated March 9, 1992. I will send a photograph of the signs once they have been developed and placed in the laboratories.

The photographs include two drums of hazardous waste in the hazardous waste storage room (SL 0308). The labels on the drums are completely filled out and include the hazardous waste code, contents, generator information and accumulation date.

2. Failure to conduct and document weekly inspections of containers as required by 35 Ill. Adm. Code 725.274 and failure to inspect the facility for malfunctions and deterioration, operating errors, and discharges as required by 35 Ill. Adm. Code 725.115.

SIUE'S RESPONSE: I have included the "Daily Safety Equipment and Facility Inspection Log" and the "Weekly Drum Inspection Log". Both checklists are up to date.

3. Failure to ensure that all personnel in the RCRA Management Program receive training as required by 35 Ill. Adm. Code 725.116.

SIUE'S RESPONSE: I have included copies of the training certificates for Joe Wilson and myself as requested. These certificates are also available in the HWM department files.

Should you have any questions concerning SIUE's response, please call me at (618) 692-3584.

Sincerely,

David E. McDonald
Coordinator for Environmental Control

Daily Safety Equipment and Facility Inspection Log

Date / Item / Inspector	Goggles	Respirators	Safety Gloves	Gloves	Lab Coat or Overalls	Apron	Fire Extinguishers in place	Fire Blanket	Acid Neutralizer	Base Neutralizer	Sand w/ 10% Soda Ash	Plastic Bags	Spill Cart Supplies	Emergency Power Equipment	Main Power Unit	Hood Exhaust Switch	Shower	Eyewash Fountain	Face Shields	Body Shields	Scott Lab-Pak	Storage Containers	Distillation Appar.	* Room Order	Remarks
3-10-92 jaw	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	N/A	✓	✓	✓	N/A	Good	
3-11-92 jaw	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	N/A	✓	✓	✓	N/A	Good	
3-12-92 jaw	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	N/A	✓	✓	✓	N/A	Good	
3-13-92 jaw	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	N/A	✓	✓	✓	N/A	Good	
3-16-92 jaw	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	N/A	✓	✓	✓	N/A	Good	
3-17-92 jaw	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	N/A	✓	✓	✓	N/A	Good	
3-18-92	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	N/A	✓	✓	✓	N/A	Good	

* Report

Daily Safety Equipment and Facility Inspection Log

Item / Date / Inspector	Goggles	Respirators	Safety Gloves	Gloves	Lab Coat or Overalls	Apron	Fire Extinguishers in place	Fire Blanket	Acid Neutralizer	Base Neutralizer	Sand w/ 10% Soda Ash	Plastic Bags	Spill Cart Supplies	Emergency Power Equipment	Main Power Unit	Hood Exhaust Switch	Shower	Eyewash Fountain	Face Shields	Body Shields	Scott Lab-Pak	Storage Containers	Distillation Appar.	* Room Order	Remarks
3-19-92 jaw	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	N/A	✓	✓	✓	N/A	GOOD	
3-20-92 jaw	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	N/A	✓	✓	✓	N/A	Good	
3-23-92 jaw	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	N/A	✓	✓	✓	N/A	Good	
3-24-92 jaw	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	N/A	✓	✓	✓	N/A	Good	
3-25-92 jaw	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	N/A	✓	✓	✓	N/A	Good	
3-26-92 jaw	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	N/A	✓	✓	✓	N/A	Good	
3-27-92 jaw	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	N/A	✓	✓	✓	N/A	Good	

* Report excessive clutter in the Work

Daily Safety Equipment and Facility Inspection Log

Date / Inspector / Item	Goggles	Respirators	Safety Gloves	Gloves	Lab Coat or Overalls	Apron	Fire Extinguishers in place	Fire Blanket	Acid Neutralizer	Base Neutralizer	Sand w/ 10% Soda Ash	Plastic Bags	Spill Cart Supplies	Emergency Power Equipment	Main Power Unit	Hood Exhaust Switch	Shower	Eyewash Fountain	Face Shields	Body Shields	Scott Lab-Pak	Storage Containers	Distillation Appar.	* Room Order *	Remarks
3-30-92 jaw	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	N/A	✓	✓	✓	N/A	Good	
3-31-92 jaw	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	N/A	✓	✓	✓	N/A	Good	
4-1-92 jaw	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	N/A	✓	✓	✓	N/A	Good	
4-2-92 jaw	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	N/A	✓	✓	✓	N/A	Good	
4-3-92 jaw	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	N/A	✓	✓	✓	N/A	Good	
4-6-92 jaw	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	N/A	✓	✓	✓	N/A	Good	
4-7-92 jaw	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	N/A	✓	✓	✓	N/A	Good	

* Report

Daily Safety Equipment and Facility Inspection Log

Date / Inspector / Item	Goggles	Respirators	Safety Gloves	Gloves	Lab Coat or Overalls	Apron	Fire Extinguishers in place	Fire Blanket	Acid Neutralizer	Base Neutralizer	Sand w/ 10% Soda Ash	Plastic Bags	Spill Cart Supplies	Emergency Power Equipment	Main Power Unit	Hood Exhaust Switch	Shower	Eyewash Fountain	Face Shields	Body Shields	Scott Lab-Pak	Storage Containers	Distillation Appar.	* Room Order	Remarks
4-8-92 Jaw																									Building closed due to lab explosion upstairs (SL 2020)
4-9-92 Jaw	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	N/A	✓	✓	✓	N/A	GOOD	
4-10-92 Jaw	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	N/A	✓	✓	✓	N/A	Good	
4-13-92 Jaw	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	N/A	✓	✓	✓	N/A	Good	
4-14-92 Jaw	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	N/A	✓	✓	✓	N/A	Good	
4-15-92 Jaw	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	N/A	✓	✓	✓	N/A	Good	
4-16-92 Jaw	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	N/A	✓	✓	✓	N/A	Good	

* Report ...

Daily Safety Equipment and Facility Inspection Log

Item / Date / Inspector	4/17/92	4/20/92	4/21/92	4/22/92	4/23/92	4/24/92	4/27/92
Goggles	✓	✓	✓	✓	✓	✓	✓
Respirators	✓	✓	✓	✓	✓	✓	✓
Safety Gloves	✓	✓	✓	✓	✓	✓	✓
Gloves	✓	✓	✓	✓	✓	✓	✓
Lab Coat or Overalls	✓	✓	✓	✓	✓	✓	✓
Apron	✓	✓	✓	✓	✓	✓	✓
Fire Extinguishers in place	✓	✓	✓	✓	✓	✓	✓
Fire Blanket	✓	✓	✓	✓	✓	✓	✓
Acid Neutralizer	✓	✓	✓	✓	✓	✓	✓
Base Neutralizer	✓	✓	✓	✓	✓	✓	✓
Sand w/ 10% Soda Ash	✓	✓	✓	✓	✓	✓	✓
Plastic Bags	✓	✓	✓	✓	✓	✓	✓
Spill Cart Supplies	✓	✓	✓	✓	✓	✓	✓
Emergency Power Equipment	✓	✓	✓	✓	✓	✓	✓
Main Power Unit	✓	✓	✓	✓	✓	✓	✓
Hood Exhaust Switch	✓	✓	✓	✓	✓	✓	✓
Shower	✓	✓	✓	✓	✓	✓	✓
Eyewash Fountain	✓	✓	✓	✓	✓	✓	✓
Face Shields	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Body Shields	✓	✓	✓	✓	✓	✓	✓
Scott Lab-Pak	✓	✓	✓	✓	✓	✓	✓
Storage Containers	✓	✓	✓	✓	✓	✓	✓
Distillation Appar.	N/A	N/A	N/A	N/A	N/A	N/A	N/A
* Room Order *	Good	Good	Good	Good	Good	Good	Good
Remarks							

Daily Safety Equipment and Facility Inspection Log

Item / Date / Inspector	4-28-92 gw	4-29-92 gw	4-30-92 gw	5-1-92 gw	5-4-92 gw	5-5-92 gw	5-6-92 mw
Goggles	✓	✓	✓	✓	✓	✓	✓
Respirators	✓	✓	✓	✓	✓	✓	✓
Safety Gloves	✓	✓	✓	✓	✓	✓	✓
Gloves	✓	✓	✓	✓	✓	✓	✓
Lab Coat or Overalls	✓	✓	✓	✓	✓	✓	✓
Apron	✓	✓	✓	✓	✓	✓	✓
Fire Extinguishers in place	✓	✓	✓	✓	✓	✓	✓
Fire Blanket	✓	✓	✓	✓	✓	✓	✓
Acid Neutralizer	✓	✓	✓	✓	✓	✓	✓
Base Neutralizer	✓	✓	✓	✓	✓	✓	✓
Sand w/ 10% Soda Ash	✓	✓	✓	✓	✓	✓	✓
Plastic Bags	✓	✓	✓	✓	✓	✓	✓
Spill Cart Supplies	✓	✓	✓	✓	✓	✓	✓
Emergency Power Equipment	✓	✓	✓	✓	✓	✓	✓
Main Power Unit	✓	✓	✓	✓	✓	✓	✓
Hood Exhaust Switch	✓	✓	✓	✓	✓	✓	✓
Shower	✓	✓	✓	✓	✓	✓	✓
Eyewash Fountain	✓	✓	✓	✓	✓	✓	✓
Face Shields	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Body Shields	✓	✓	✓	✓	✓	✓	✓
Scott Lab-Pak	✓	✓	✓	✓	✓	✓	✓
Storage Containers	✓	✓	✓	✓	✓	✓	✓
Distillation Appar.	N/A	N/A	N/A	N/A	N/A	N/A	N/A
* Room Order *	GOOD	GOOD	GOOD	GOOD	GOOD	GOOD	GOOD
Remarks							

* Report deficiencies to supervisor

Daily Safety Equipment and Facility Inspection Log

Item / Date / Inspector	5-7-92	5-8-92	5-11-92	5-12-92	5-13-92	5-14-92	5-15-92
	JW	JW	JW	JW	JW	JW	JW
Goggles	✓	✓	✓	✓	✓	✓	✓
Respirators	✓	✓	✓	✓	✓	✓	✓
Safety Gloves	✓	✓	✓	✓	✓	✓	✓
Gloves	✓	✓	✓	✓	✓	✓	✓
Lab Coat or Overalls	✓	✓	✓	✓	✓	✓	✓
Apron	✓	✓	✓	✓	✓	✓	✓
Fire Extinguishers in place	✓	✓	✓	✓	✓	✓	✓
Fire Blanket	✓	✓	✓	✓	✓	✓	✓
Acid Neutralizer	✓	✓	✓	✓	✓	✓	✓
Base Neutralizer	✓	✓	✓	✓	✓	✓	✓
Sand w/ 10% Soda Ash	✓	✓	✓	✓	✓	✓	✓
Plastic Bags	✓	✓	✓	✓	✓	✓	✓
Spill Cart Supplies	✓	✓	✓	✓	✓	✓	✓
Emergency Power Equipment	✓	✓	✓	✓	✓	✓	✓
Main Power Unit	✓	✓	✓	✓	✓	✓	✓
Hood Exhaust Switch	✓	✓	✓	✓	✓	✓	✓
Shower	✓	✓	✓	✓	✓	✓	✓
Eyewash Fountain	✓	✓	✓	✓	✓	✓	✓
Face Shields	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Body Shields	✓	✓	✓	✓	✓	✓	✓
Scott Lab-Pak	✓	✓	✓	✓	✓	✓	✓
Storage Containers	✓	✓	✓	✓	✓	✓	✓
Distillation Appar.	N/A	N/A	N/A	N/A	N/A	N/A	N/A
* Room Order *	GOOD	GOOD	GOOD	GOOD	GOOD	GOOD	GOOD
Remarks							

WEEKLY DRUM INSPECTION LOG

Date	Inspector	Condition of Containers	All Containers Closed	Signs of Leakage (incl. floors, drums, etc.)	Remarks (if corrective action is required	List Nature Description of Acti taken & Date taken
3/12/92	JAW	Good	✓	None	—	—
3/19/92	JAW	Good	✓	None	—	—
3/26/92	JAW	Good	✓	None	—	—
4/2/92	JAW	Good	✓	None	—	—
4/9/92	JAW	Good	✓	None	—	—
4/16/92	JAW	Good	✓	None	—	—
4/23/92	JAW	Good	✓	None	4/24/92 - DS-010-91 - DS-014-92 removed offsite DS-011-91 had a dent, but no leaks	
4/30/92	JAW	Good	✓	None	4/27/92 - DS-015-92 & DS-016-92 started and labelled	
5/7/92	JAW	Good	✓	None	—	—
5/14/92	JAW	Good	✓	None	—	—

TRAINING CERTIFICATE

THIS CERTIFIES THAT THE UNDERSIGNED

Joe A. Wilson
EMPLOYEE: PRINT YOUR NAME

Joe A. Wilson
SIGNATURE

HAS COMPLETED A TRAINING PROGRAM FOR:

- ☒ **Right-To-Know**
- ☒ **Hazardous Waste Management**
- ☒ **Respirator Fitting, Use and Care**

DATE OF TRAINING 1/09/92

PLACE OF TRAINING Southern Illinois University at Edwardsville
COMPANY NAME

TRAINER'S SIGNATURE David M. Thomas

ON-SITE ENVIRONMENTAL SERVICES

Employee Training Quiz for Hazardous Materials & Hazardous Waste Handling

-1

Name Joe A. Wilson
Title General Assistant
Date 1/9/92

Circle the correct answer for each of the questions. There is only ONE correct answer for each question. ~~Answers to the questions are on the last page of this quiz.~~ Ok

1. The Federal law for worker safety covering use of chemicals is called the _____ Communication Act.
   (a.) Right to Know
   b. Hazard
   c. MSDS
   d. None of the above

2. Employer responsibilities toward employees is to
   a. Teach how to tell if a hazardous material has been released at work
   b. Explain material safety data sheets
   c. Tell you which materials are hazardous
   (d.) All of the above

3. If you have questions about a hazardous material you should
   a. Call the environmental protection agency
   b. Ask your supervisor
   c. Read about it in the employee training manual
   (d.) Both b and c

4. Specific and detailed information about a hazardous material can be found in
   a. Hazardous Material Inventory Roster
   b. Container warning label
   (c.) Material Safety Data Sheet
   d. Resource Conservation Recovery Act

5. If a container doesn't have a label, you should
   a. Place a warning label on the container if its hazardous
   b. Find out what the material is
   c. Replace torn or unreadable labels
   d. all of the above

6. Basic information found on labels of hazardous materials
   a. Give warnings for the kind of material in the container
   b. Explain basic effects of exposure
   c. Gives the manufacturers name
   d. Lists equipment to wear when handling the substance
   e. All of the above

7. Your employer is required to have an MSDS for
   a. The majority of the hazardous materials you work with
   b. Every hazardous material you work with
   c. Those hazardous materials that are waste materials
   d. None of the above

8. The Material Safety Data Sheet tells the reader
   a. What's in the chemical that can harm someone
   b. What temperature the material will catch fire
   c. What to use to clean up a spill or leak
   d. All of the above

9. The Material Safety Data Sheet tells the reader
   a. What protective equipment is needed to handle the material
   b. What records to maintain on storing and treating of hazardous waste
   c. Specific requirement for the regulation of solvents
   d. Local and state requirements for the waste manifest
   e. None of the above

10. The Material Safety Data Sheet covers
    a. How you would feel if exposed to a hazardous material
    b. Personal protection equipment such as a respirator
    c. What type of extinguishers to use
    d. All of the above

11. Signs and symptoms of exposure to a hazardous material could be
    a. Eye irritaiton
    b. Dizziness and nausea
    c. Headache
    d. Aggravation of existing medical condition
    e. All of the above

12. A material that will easily catch fire or explode needs this warning label
    a. Flammable
    b. Corrosive
    c. Reactive
    d. Poison

13. A chemical that will become unstable if mixed with air, water, heat, or other materials needs this warning label
    a. Flammable
    b. Corrosive
    c. Reactive
    d. Poison

14. A chemical product that will cause illness or death after being inhaled needs this warning label
    a. Flammable
    b. Corrosive
    c. Reactive
    d. Poison

15. When mixing hazardous materials you need to know
    a. Almost all materials will mix with each other in small quantities
    b. To read the container label and manufaturers instructions
    c. Acids, bases, catalysts, and threshold levels
    d. Emergency phone numbers for fire and rescue

16. Information on storage of hazardous materials is
    a. Found on the product label
    b. Found on the product MSDS
    c. Not necessary if the material is in a tightly sealed container
    d. Both a and b above

17. For storage and mixing of hazardous materials
    a. The area you store a material in is not important as long as the container is sealed
    b. When storing a hazardous material warning labels are not needed if you use the material with in 2 weeks
    c. When transfering a hazardous material to another container, transfer only small amounts and make sure large containers are properly grounded

18. The proper way to dispose of hazardous waste material is
    a. Have licensed disposal contractor remove it
    b. Recycle the material if possible for reuse
    c. a and b
    d. None of the above

19. Accidental spills can create different problems
    a. If flammable, a spark can cause a fire
    b. Vapors can irritate or damage throat and lungs
    c. a and b
    d. None of the above

20. The spill section on the container label or MSD Sheet will tell you
    a. Who to contact for help
    b. What kind of gloves and respirator to wear
    c. How it will affect the lungs and skin
    d. None of the above

21. To stop or limit a small spill you should
    a. Inform your supervisor
    b. Remove anything that could cause the material to ignite
    c. Use recommended absorbents (On the MSD Sheet)
    d. All of the above

22. Large spills are to be treated in a special manner
    a. Get trained "clean up" personnel immediately
    b. Warn co workers to leave the area
    c. Get the product MSDS to give information to the clean up people
    d. All of the above

23. Disposing of a hazardous waste material is accomplished by
    a. Amounts under 2 liters can be flushed down the drain --use large amounts of water
    b. Having the garbage or trash hauler remove it
    c. Absorbing it in cotton and burning it
    d. None of the above

24. These are responsiblities for handling hazardous wastes
    a. Make sure you don't mix different hazardous wastes in the same container
    b. Wear proper protective equipment when handling a hazardous waste material
    c. Use correct storage containers and make sure they are sealed tightly
    d. All of the above

25. Disposal instructions can be found
    a. On the product label
    b. On the product MSDS
    c. By asking your shop manager
    d. both b and c

26. Over exposure to a hazardous material means you could experience
    a. Headache, dizziness, or very sick feeling
    b. Could receive lung, kidney, liver disease
    c. No immediate effect because the chemical acts slowly
    d. All of the above

27. The way to prevent accidental exposure to hazardous materials
    a. Know the material you are handling
    b. Use proper personal protective equipment
    c. Follow proper clean up procedures
    d. All of the above

28. Before using protective equipment you should inspect it for
    a. Proper fit
    b. Rips, tears
    c. Damaged parts
    d. All of the above

29. The Hazardous Material Identification System (HMIS)
    a. Shows how dangerous a hazard is by numbering 0-4
    b. Uses colors and pictures to show how hazardous a chemical is
    c. Uses symbols to show how hazardous a chemical is
    d. All of the above

Emergency Response Procedures Training

The following personnel have been trained in emergency response procedures and have been acquainted with the Hazardous Waste Management Departments emergency contingency plan:

1. David McDonald 3-10-92
2. Joe A Wilson 3-10-92

TRAINING CERTIFICATE

THIS CERTIFIES THAT THE UNDERSIGNED

David McDonald
EMPLOYEE: PRINT YOUR NAME

David McDonald
SIGNATURE

HAS COMPLETED A TRAINING PROGRAM FOR:

- ☑ Right-To-Know
- ☑ Hazardous Waste Management
- ☑ Respirator Fitting, Use and Care

DATE OF TRAINING 3-10-92

PLACE OF TRAINING SIUE
COMPANY NAME

TRAINER'S SIGNATURE David McDonald

ON-SITE ENVIRONMENTAL SERVICES

Employee Training Quiz for Hazardous Materials & Hazardous Waste Handling

-0

Name David McDonald
Title Coordinator for Environmental Control
Date 3-10-92

Circle the correct answer for each of the questions. There is only ONE correct answer for each question. Answers to the questions are on the last page of this quiz.

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   c. Replace torn or unreadable labels
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    (e) All of the above

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    d. Poison

13. A chemical that will become unstable if mixed with air, water, heat, or other materials needs this warning label
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    (c) Reactive
    d. Poison

14. A chemical product that will cause illness or death after being inhaled needs this warning label
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    (c) a and b
    d. None of the above

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OK

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    d. both b and c

26. Over exposure to a hazardous material means you could experience
    a. Headache, dizziness, or very sick feeling
    b. Could receive lung, kidney, liver disease
    c. No immediate effect because the chemical acts slowly
    d. All of the above

27. The way to prevent accidental exposure to hazardous materials
    a. Know the material you are handling
    b. Use proper personal protective equipment
    c. Follow proper clean up procedures
    d. All of the above

28. Before using protective equipment you should inspect it for
    a. Proper fit
    b. Rips, tears
    c. Damaged parts
    d. All of the above

29. The Hazardous Material Identification System (HMIS)
    a. Shows how dangerous a hazard is by numbering 0-4
    b. Uses colors and pictures to show how hazardous a chemical is
    c. Uses symbols to show how hazardous a chemical is
    d. All of the above

Certificate

This is to certify that

David McDonald
Southern Illinois University at Edwardsville

has successfully completed the

ENVIRONMENTAL RESOURCE CENTER

Advanced Hazardous Waste Management Under RCRA Seminar

Brian Karnofsky, President

15 April 1992
Date

Certificate No.: 11032

Certificate

This is to certify that

David McDonald
Southern Illinois University at Edwardsville

has successfully completed the

ENVIRONMENTAL RESOURCE CENTER

Hazardous Waste Management Under RCRA Seminar

Daniel J. Young

Daniel J. Young, Instructor
Certified Environmental Trainer

13 August 1991

Date

Certificate No.: 7726

This certifies that

DAVID McDONALD

SS# 486-76-6746

has successfully completed the refresher course for

(including an examination)

Management Planner Training

As specified by the E.P.A. under
AHERA regulations - October 30, 1987
Maple Woods Community College - Business Training Center
10771 Ambassador Drive - Kansas City, Missouri 64153
(816) 891-6500

MARCH 1, 1991
Course Date

Richard O. Holzrichter
Program Coordinator

7MW 0391728R
Certificate #

MARCH 1, 1991 / MARCH 1, 1992
Date Expiration Date

This certifies that

DAVID McDONALD

SS# 486-76-6746

has successfully completed the refresher course for

(including an examination)

Inspector Training

As specified by the E.P.A. under
AHERA regulations - October 30, 1987
Maple Woods Community College - Business Training Center
10771 Ambassador Drive - Kansas City, Missouri 64153
(816) 891-6500

MARCH 1, 1991
Course Date

Richard O. Holzrichter
Program Coordinator

7MW 0391722R
Certificate #

MARCH 1, 1991 / MARCH 1, 1992
Date Expiration Date

ENVIRONMENTAL SCIENCE AND ENGINEERING, INC.

CERTIFICATE OF TRAINING

This is to Certify that

David E. McDonald

has Successfully Completed

THE SUPERVISOR'S COURSE

in

Hazardous Materials

&

Site Investigations

SS0218911009
Certificate #

February 18, 1991
Date of Instruction

Mark Wahlen
Instructor

ENVIRONMENTAL SCIENCE AND ENGINEERING, INC.

CERTIFICATE OF TRAINING

This is to Certify that

David McDonald

has Successfully Completed

THE ANNUAL REFRESHER COURSE

in

Hazardous Materials

&

Site Investigations

S021991R1005	February 19, 1991	Mark Walters
Certificate #	**Date of Instruction**	**Instructor**

MAY 09 1991

5HR-12

Antony Wilbraham, Ph.D.
Acting Director
Hazardous Waste Management
Southern Illinois University
P.O. Box 1652
Edwardsville, Illinois 62026

Re: Southern Illinois University
(Edwardsville)
ILD 006 331 342

Dear Dr. Wilbraham:

The United States Environmental Protection Agency (U.S. EPA) has reviewed your letter dated April 19, 1991. That letter documented actions taken by the above-referenced facility to correct violations identified in our Notice of Violation dated April 10, 1991. The action stated in your letter appear to adequately address the violations.

Your cooperation and efforts in this matter are greatly appreciated. Please feel free to contact Ms. Barbara Russell of my staff at (312) 353-7922, if you have any further questions.

Sincerely yours,

Kevin Pierard, Acting Chief
RCRA Enforcement Branch

cc: William Radlinski, IEPA
Glen Savage, IEPA
Mike Grant, IEPA, Collinsville

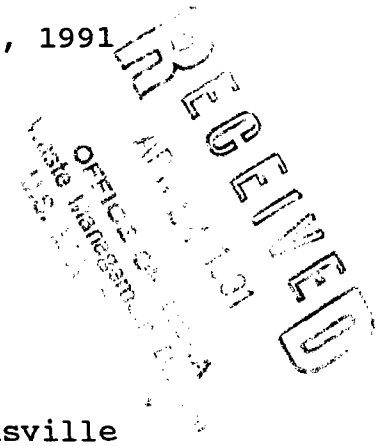
B.RUSSELL:ev:05/06/91:disk # Filename:AWILBRA 5/8/91

SIGNATURE/INITIAL CONCURRENCE REQUESTED - RCRA ENFORCEMENT BRANCH (REB)									
TYP.	AUTH	IL/IN TES CHIEF	MI/WI TES CHIEF	MN/OH TES CHIEF	IL/MI/WI EPS CHIEF	IN/MN/OH EPS CHIEF	REB BRANCH CHIEF	RCRA ASSOC. DIR.	WMD DIVISION DIRECTOR
5-7-91	for 5/7/91				5/7/91		for 5/8/91		

SIUE Southern Illinois University at Edwardsville

School of Sciences
Department of Chemistry

April 19, 1991



Mr. William E. Muno
RCRA Enforcement Branch
United States Environmental Protection Agency
Region 5
230 South Dearborn Street
Chicago, IL 60604

ATTENTION: 5HR-12

RE: Notice of Violation
Southern Illinois University at Edwardsville
ILD 006 331 342

Dear Sir:

The following actions have been taken to correct the violation cited in the report by Mr. Gerald Golubski following an inspection of Southern Illinois University at Edwardsville on February 15, 1991.

Violation of Section 725.273. The hazardous waste personnel and the teaching assistants in the laboratories have been advised to check frequently to ensure that containers of chemical wastes in the hoods, in the teaching labs, are kept closed except for filling or emptying. The faculty coordinators of the teaching laboratories have also been informed of this violation and will help to enforce the regulations.

Please let me know if I can be of further assistance in this matter.

Sincerely,

Antony C. Wilbraham
Acting Director
Hazardous Waste Mangement

ACW/paw

cc: Dr. Benjamin Quillian, Vice President for Admin., SIUE
Mr. Mike Grant, IL EPA, Collinsville
Mr. Jay Patrick, SIUE
Dr. Emil F. Jason, SIUE
Dr. James Hunsley, Coordinator of Chemistry teaching lab
Dr. James McClure, Coordinator of Chemistry teaching lab
Dr. Robert Leiby, Coordinator of Chemistry teaching lab
Dr. Leah O'Brien, Coordinator of Chemistry teaching lab
Dr. Sadegh Khazaeli, Coordinator of Chemistry teaching lab
Hazardous Waste Lab Personnel

APR 1 0 1991

5HR-12

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Antony Wilbraham, Ph.D.
Professor of Chemistry
Southern Illinois University (Edwardsville)
P.O. Box 1652
Edwardsville, Illinois 62026

Re: Notice of Violation
Southern Illinois University
(Edwardsville)
ILD 006 331 342

Dear Dr. Wilbraham:

On February 15, 1991, an inspection of Southern Illinois University (Edwardsville) was conducted by representatives of the United States Environmental Protection Agency (U.S. EPA). Under Section 3007 of the Resource Conservation and Recovery Act (RCRA), Federal Agencies have been granted the primary responsibility for ensuring the compliance of State facilities under their jurisdiction.

The purpose of the inspection was to determine if Southern Illinois University (Edwardsville) was in compliance with the State equivalent requirements of Subtitle C of RCRA as amended, 42 U.S.C. §6901 et seq. The State requirements are found at 35 Ill. Adm. Code Part 720 et seq. A copy of the inspection report is enclosed for your information.

As a result of the RCRA inspection, the following violation has been identified:

> Failure to store containers closed as required by 725.273 i.e., it was noted during this inspection that several teaching labs had open containers.

Please submit to this office, within thirty (30) days of receipt of this Notice of Violation, a written description of actions taken to correct the aforementioned violation and what measures have been initiated to assure future compliance. Failure to correct the violation may subject the facility to further Federal enforcement action.

Barbara Russell SHR-12

P 366 562 145

RECEIPT FOR CERTIFIED MAIL

NO INSURANCE COVERAGE PROVIDED
NOT FOR INTERNATIONAL MAIL

(See Reverse)

Sent to ANTONY Wilbraham PhD	
Street and No. P.O. Box 1652	
P.O., State and ZIP Code Edwardsville, IL 62026	
Postage	$ 2.90
Certified Fee	1.00
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt showing to whom and Date Delivered	1.00
Return Receipt showing to whom, Date, and Address of Delivery	
TOTAL Postage and Fees	$ 4.90
Postmark or Date	

PS Form 3800, June 1985

☆U.S.G.P.O. 1989-234-555

STICK POSTAGE STAMPS TO ARTICLE TO COVER FIRST CLASS POSTAGE, CERTIFIED MAIL FEE, AND CHARGES FOR ANY SELECTED OPTIONAL SERVICES. (see front)

1. If you want this receipt postmarked, stick the gummed stub to the right of the return address leaving the receipt attached and present the article at a post office service window or hand it to your rural carrier. (no extra charge)

2. If you do not want this receipt postmarked, stick the gummed stub to the right of the return address of the article, date, detach and retain the receipt, and mail the article.

3. If you want a return receipt, write the certified mail number and your name and address on a return receipt card, Form 3811, and attach it to the front of the article by means of the gummed ends if space permits. Otherwise, affix to back of article. Endorse front of article **RETURN RECEIPT REQUESTED** adjacent to the number.

4. If you want delivery restricted to the addressee, or to an authorized agent of the addressee, endorse **RESTRICTED DELIVERY** on the front of the article.

5. Enter fees for the services requested in the appropriate spaces on the front of this receipt. If return receipt is requested, check the applicable blocks in item 1 of Form 3811.

6. Save this receipt and present it if you make inquiry.

☆U.S.G.P.O. 1989-234-555

If you have any questions regarding this correspondence, please contact Ms. Barbara Russell of my staff at (312) 353-7922.

Sincerely yours,

Kevin Pierard, Acting Chief
RCRA Enforcement Branch

Enclosures

cc: Glen Savage, IEPA
William Radlinski, IEPA

B.RUSSELL:ev:03/15/91:disk # Filename:Antony 3/29/91

SIGNATURE/INITIAL CONCURRENCE REQUESTED - RCRA ENFORCEMENT BRANCH (REB)									
TYP.	AUTH	IL/IN TES CHIEF	MI/WI TES CHIEF	MN/OH TES CHIEF	IL/MI/WI EPS CHIEF	IN/MN/OH EPS CHIEF	REB BRANCH CHIEF	RCRA ASSOC. DIR.	WMD DIVISION DIRECTOR
ED 3-27	BR 3/27/91				PH 3-27-91		4-1-91		

STATE OF ARKANSAS
Department of Pollution Control and Ecology
P. O. Box 9583 Little Rock, Arkansas 72219
Telephone 501-562-7444

Please print or type. *(Form designed for use on elite (12-pitch) typewriter.)*

Form Approved. OMB No. 2050-0039. Expires 9-30-91

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator's US EPA ID No. I L D 0 0 6 3 3 1 3 4 2 8 — Manifest Document No. 2 9 1 2

2. Page 1 of 1

Information in the shaded areas is not required by Federal law.

Generator

Generator's Name and Mailing Address
SIUE. EDWARDSVILLE
ATTN: Tony Wilbraham
School Of Sciences, Edwardsville, Ill. 62026-1652

4. Generator's Phone (618) 692-2042

A. State Manifest Document Number: AR- 482912

B. State Generator's ID: 1190255002

Transporter

5. Transporter 1 Company Name: Precision Energy Systems
6. US EPA ID Number: M O D 9 8 0 9 7 1 9 7 2
C. State Transporter's ID: PC ____ H 1584
D. Transporter's Phone: 314-383-7755

7. Transporter 2 Company Name: Two Rivers Trucking
8. US EPA ID Number: I L D 9 8 4 7 6 7 0 9 5
E. State Transporter's ID: PC ____ H 1728
F. Transporter's Phone: 618-398-6755

Facility

9. Designated Facility Name and Site Address
Rineco Chemical Industries
1007 Vulcan Road-Haskell
Benton, AR 72015
10. US EPA ID Number: A R D 9 8 1 0 5 7 8 7 0
G. State Facility's ID: N/A
H. Facility's Phone: 501-778-9089

11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)	12. Containers No.	Type	13. Total Quantity	14. Unit Wt/Vol	I. Waste No.
a. * RQ Waste Flammable Liquid, n.o.s. (Acetone, Alcohol) Flammable Liquid, UN 1993 (ERG90 Guide 27)	001	DM	00055	gal	F003
b. ** RQ Waste Flammable Liquid, n.o.s. (Benzine, Chloride) Flammable Liquid, UN 1993 (ERG90 Guide 27)	001	DM	00055	gal	F002
c.					
d.					

J. Additional Descriptions for Materials Listed Above

K. Handling Codes for Wastes Listed Above

EMERGENCY RESPONSE INFORMATION:
John T. Jurecek
314-383-7755

if no alternate TSDF, return to generator

15. Special Handling Instructions and Additional Information

* Rineco ID 9103-0561
** Rineco ID 9103-0560

16. **GENERATOR'S CERTIFICATION:** *I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified,* packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations and Arkansas state regulations.
If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.

Printed/Typed Name: X ANTONY C WILBRAHAM — Signature: [signature] — Month 0 3 Day 11 Year 9 1

Transporter

17. Transporter 1 Acknowledgement of Receipt of Materials
Printed/Typed Name: Gummersheimer Tony — Signature: [signature] — Month 0 3 Day 11 Year 9 1

18. Transporter 2 Acknowledgement of Receipt of Materials
Printed/Typed Name: EARL ANDERSON — Signature: [signature] — Month 03 Day 11 Year 91

Facility

19. Discrepancy Indication Space

20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.
Printed/Typed Name: LARRY PARKER — Signature: [signature] — Month 03 Day 29 Year 91

EPA Form 8700-22 (Rev. 9-88) Previous edition is obsolete.

NOTICE: THE ORIGINAL AND NOT LESS THAN TWO (2) COPIES MUST MOVE WITH THE HAZARDOUS WASTE SHIPMENT. ONCE DELIVERED, THE TREATMENT, STORAGE, DISPOSAL FACILITY MUST RETURN THE ORIGINAL COPY TO THE GENERATOR.

STATE OF ARKANSAS
Department of Pollution Control and Ecology
P. O. Box 8913 Little Rock, Arkansas 72219-8913
Telephone 501-562-7444

Please print or type. *(Form designed for use on elite (12-pitch) typewriter.)*

Form Approved. OMB No. 2050-0039. Expires 9-30-91

AR 1-91

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator's US EPA ID No. ILD063313HR Manifest Document No. 05477 | 2. Page 1 of 1 | Information in the shaded areas is not required by Federal law.

3. Generator's Name and Mailing Address
S.I.U.E.
ATTN. Tony Wilbrahm
School of Sciences
Edwardsville, Ill 62026-1652
4. Generator's Phone (618) 692-2042

A. State Manifest Document Number AR- 505477
B. State Generator's ID

5. Transporter 1 Company Name: Precision Energy Systems
6. US EPA ID Number: ILD 981220808 4
C. State Transporter's ID PC ____ H 4584
D. Transporter's Phone 314-383-7755

7. Transporter 2 Company Name: Tri-State Trucking
8. US EPA ID Number: ILD 981476709 5
E. State Transporter's ID PC 1258 H ~~7788~~ 5537
F. Transporter's Phone 618-398-6753

9. Designated Facility Name and Site Address
Rineco Chemical Industries
1007 Vulcan Road-Haskell
Benton, AR 72015
10. US EPA ID Number: ARD 981057870
G. State Facility's ID: N/A
H. Facility's Phone: 501-778-9089

11. US DOT Description *(Including Proper Shipping Name, Hazard Class, and ID Number)*	12. Containers No.	Type	13. Total Quantity	14. Unit Wt/Vol	I. Waste No.
a. * RQ Waste Flammable Liquid N.O.S. (Acetone Alcohol), Flammable Liquid, UN1993 ~~(ERG 129)~~ ERG #27	002	DM	1110	gal	F003
b. ** RQ Waste Flammable Liquid N.O.S. (Methylene Chloride, Benzene) ~~Flammable Liquid, UN1993~~ ~~(ERG 129)~~ ERG #27	002	DM	1110	gal	F002
c.					
d.					

J. Additional Descriptions for Materials Listed Above

K. Handling Codes for Wastes Listed Above

EMERGENCY RESPONSE INFORMATION:
John Jurcek
(314) 383-7755

if no alternate TSDF, return to generator

15. Special Handling Instructions and Additional Information
* Rineco ID - 9103-0561
** Rineco ID - 9103-0560

16. **GENERATOR'S CERTIFICATION:** I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations and Arkansas state regulations.
If I am a large quantity generator, I certify that I have a program in place to reduce the volumn and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.

Printed/Typed Name	Signature	Month Day Year
John Shourd	John Shourd	05 23 91

TRANSPORTER

17. Transporter 1 Acknowledgement of Receipt of Materials

Printed/Typed Name	Signature	Month Day Year
Gunnersheimer Terry		05 23 91

18. Transporter 2 Acknowledgement of Receipt of Materials

Printed/Typed Name	Signature	Month Day Year
EARL ANDERSON	Earl Anderson	05 23 91

FACILITY

19. Discrepancy Indication Space

20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.

Printed/Typed Name	Signature	Month Day Year
RAYMOND L. REAGAN	Raymond L. Reagan	05 23 91

EPA Form 8700-22 (Rev. 9-88) Previous edition is obsolete.

NOTICE: THE ORIGINAL AND NOT LESS THAN TWO (2) COPIES MUST MOVE WITH THE WASTE. THE DISPOSAL FACILITY MUST RETURN THIS ORIGINAL COPY TO THE GENERATOR

STATE OF ILLINOIS

P.O BOX 19276 , SPRINGFIELD, ILLINOIS 62794-9276 (217) 782-6761

State Form LPC 62 8/81 IL532-0610

PLEASE TYPE (Form designed for use on elite (12-pitch) typewriter.) **EPA Form 8700-22 (Rev. 9-88)** Form Approved OMB No. 2050-0039, Expires 9-30-91

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator's US EPA ID No. I L D 0 0 6 3 3 1 3 4 2 | Manifest Document No. 0 3 4 1 8

2. Page 1 of 1 — Information in the shaded areas is not required by Federal law, but is required by Illinois law.

3. Generator's Name and Mailing Address
Southern Illinois University
P. O. Box 1652
Edwardsville, IL 62026

Location If Different:

4. Generator's Phone (618)692-3562 Attn: Tony wilbraham

A. Illinois Manifest Document Number: IL 4503418 Fee Paid, if Applicable

B. Illinois Generator's ID: 1 1 1 9 0 2 5 5 0 0 2

5. Transporter 1 Company Name: Precision Energy Systems, Inc.

6. US EPA ID Number: I L D 9 8 2 2 0 8 0 8 4

C. Illinois Transporter's ID: 1 5 0 5

D. (708)916-1661 Transporter's Phone

7. Transporter 2 Company Name: Chemical Services

8. US EPA ID Number: I L D 9 8 0 7 0 1 1 0 6

E. Illinois Transporter's ID: 1 3 0 1

F. (708)597-3380 Transporter's Phone

9. Designated Facility Name and Site Address
Environmental Enterprises, Inc.
4650 Spring Grove
Cincinnati, Ohio 45232

10. US EPA ID Number: O H D 0 8 3 3 7 7 0 1 0

G. Illinois Facility's ID: 9 3 9 0 6 1 5 1 8 3

H. Facility's Phone: (513)541-1823

11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)	12. Containers No.	Type	13. Total Quantity	14. Unit Wt/Vol	I. Waste No.
a. "RQ", WASTE POISONOUS SOLID, n.os.., POISON B, UN2811 (BARIUM SALTS)	0.0.1	D.M	0 0 0 0 4	1	EPA HW Number: X X D 0 0 5; Authorization Number:
b. WASTE FLAMMABLE LIQUID, n.o.s., FLAMMABLE LIQUID, UN1993 (PYRIDINE)	0.0.1	D.F	0 0 0 0 1	1	EPA HW Number: X X F 0 0 5; Authorization Number:
c. "RQ", WASTE POISONOUS LIQUID, n.o.s., POISON B, UN2810 (BARIUM SALTS)	0.0.1	D.M	0 0 0 0 8	1	EPA HW Number: X X D 0 0 5; Authorization Number:
d.					EPA HW Number: X X; Authorization Number:

J. Additional Descriptions for Materials Listed Above
132063
Line 11a: Drum #1, 30 GALLON LAB PCK, D007,D008,D004,D009
Line 11b: Drum #2, 5 GALLON LAB PACK, D007,D008 132064
Line 11c: Drum #3, 55 GALLON LAB PACK, D007, D008 132065

K. Handling Codes for Wastes Listed Above In Item # 14
1 = Gallons 2 = Cubic Yards
a) S01 · T21
b) S01 T50
c) S01 · T21

15. Special Handling Instructions and Additional Information
51321
IN CASE OF EMERGENCY CONTACT (708) 916-1661

16. **GENERATOR'S CERTIFICATION:** I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations.

If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.

GENERATOR

Printed/Typed Name: T. A. WILBRAHAM — Signature: [signature] — Date: Month 05 Day 29 Year 91

17. Transporter 1 Acknowledgement of Receipt of Materials

Printed/Typed Name: MIKE WILK — Signature: [signature] — Date: Month 05 Day 29 Year 91

TRANSPORTER

18. Transporter 2 Acknowledgement of Receipt of Materials

Printed/Typed Name: R. O'Donnell — Signature: [signature] — Date: Month 06 Day 03 Year 91

19. Discrepancy Indication Space

FACILITY

20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.

Printed/Typed Name: Steve Hethcoat — Signature: [signature] — Date: Month 06 Day 11 Year 91

This Agency is authorized to require, pursuant to Illinois Revised Statutes, Chapter 111½ Section 21, that this information be submitted to the Agency. Failure to provide the information may result in a civil penalty against the owner or operator of not to exceed $25,000 per day of violation. Falsification of this information may result in a fine up to $50,000 per day of violation and imprisonment up to 5 years. This form has been approved by the Forms Management Center.

COPY 1. TSD MAIL TO GENERATOR COPY

STATE OF ARKANSAS
Department of Pollution Control and Ecology
P. O. Box 8913 Little Rock, Arkansas 72219-8913
Telephone 501-562-7444

Dave McDonald.
The Manifest you Requested.
9-30-94

Please print or type. (Form designed for use on elite (12-pitch) typewriter)

Form Approved OMB No. 2050-0039 Expires 9-30-94

UNIFORM HAZARDOUS WASTE MANIFEST	1. Generator's US EPA ID No. / Manifest Document No.	2. Page 1 of 1	Information in the shaded areas is not required by Federal law.
	I L D 0 6 3 3 1 3 4 2 2 6 3 6 1		

3. Generator's Name and Mailing Address
S.I.U.E. EDWARDSVILLE ATTN. DAVE McDONALD
SCIENCE Dept. EDWARDSVILLE IL., 62026-1652
4. Generator's Phone: 618 692-2000

A. State Manifest Document Number: AR- 526359
B. State Generator's ID: 1190255002

5. Transporter 1 Company Name: PRECISION ENERGY SYSTEM INC.
6. US EPA ID Number: I L D 9 8 2 2 0 8 0 8 4
C. State Transporter's ID: PC . . . . H 1584
D. Transporter's Phone: (314)383-7755

7. Transporter 2 Company Name: TWO RIVERS TRUCKING
8. US EPA ID Number: I L D 9 8 4 7 6 7 0 7 0
E. State Transporter's ID: PC 1258 H 537
F. Transporter's Phone: (618)388-6752

9. Designated Facility Name and Site Address
RINECO CHEMICAL INDUSTRIES
1007 VULCAN RD.- HASKELL
BENTON, AR. 72015
10. US EPA ID Number: A R D 9 8 1 0 5 7 8 7 0
G. State Facility's ID: N/A
H. Facility's Phone: (501)778-9089

11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)	12. Containers No.	Type	13. Total Quantity	14. Unit Wt/Vol	I. Waste No.
GENERATOR a. * WASTE FLAMMABLE LIQUID,N.D.S. (METHYLENE CHLORIDE BENZENE) FLAMMABLE LIQUID, UN 1993 CERG-27	0 1	D M	0 0 1 4 0	GAL	F002
b.					
c.					
d.					

J. Additional Descriptions for Materials Listed Above
*140 GALLON TOLTAL 9103-0560
ONE 55 GALLON DM ONE 85 GALLON OVERPACK DM

If no alternate TSDF, return to generator

K. Handling Codes for Wastes Listed Above
EMERGENCY RESPONSE INFORMATION.
JOHN T. JURACER
(314)383-7755

15. Special Handling Instructions and Additional Information

16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations and Arkansas state regulations.
If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.

Printed/Typed Name	Signature	Month Day Year
David E McDonald	David E. McDonald	10 1 91

TRANSPORTER

17. Transporter 1 Acknowledgement of Receipt of Materials

Printed/Typed Name	Signature	Month Day Year
Gummersheimer Terry	Terry A Gummersheimer	10 1 91

18. Transporter 2 Acknowledgement of Receipt of Materials

Printed/Typed Name	Signature	Month Day Year
EARL ANDERSON	Earl J Anderson	10 1 91

FACILITY

19. Discrepancy Indication Space

20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19

Printed/Typed Name	Signature	Month Day Year
Sean Green	Sean Green	10 1 91

EPA Form 8700-22 (Rev. 9-88) Previous editions are obsolete.

WEEKLY DRUM INSPECTION LOG

Date	Inspector	Condition of Containers	All Containers Closed	Signs of Leakage (incl. floors, drums, etc.)	Remarks (if corrective action is required	List Nature Description of Actions taken & Date taken
1-6-92	David McDowell	Good	Yes	None	None	

WEEKLY DRUM INSPECTION LOG

Date	Inspector	Condition of Containers	All Containers Closed	Signs of Leakage (incl. floors, drums, etc.)	Remarks (if corrective action is required	List Nature Description of Actions taken & Date taken
10/07/91	Ming Zhou	Good	Yes	no		
10/14/91	Ming Zhou	Good	Yes	no		
10/21/91	Ming Zhou	Good	Yes	no		
10/28/91	Ming Zhou	Good	Yes	No.		
11/04/91	Ming Zhou	Good	Yes	No		
11/11/91	Ming Zhou	Good	Yes	No		
11/18/91	Ming Zhou	Good	Yes	No		
12/02 91	Ming Zhou	Good	Yes	No		
12/09 91	Ming Zhou	Good	Yes	No		

WEEKLY DRUM INSPECTION LOG

Date	Time / Inspector	Condition of Containers	All Containers Closed	Signs of Leakage (incl. floors, drums, etc.)	Remarks (if corrective action is required	List Nature Description of Action taken & Date taken
8-9-91	3:00 pm GWFranklin	Solid	yes	none	High gas pressure in DS-011-91 GWF	
8-14-91	2:15 pm GWFranklin	Solid	yes	none	High gas pressure relieved on DS-011-91 GWF	
8-21-91	3:30 pm GWFranklin	Solid	yes	none	High gas pressure relieved on DS-009, 010, and 011-91	
8-28-91	12:00 pm GWFranklin	Solid	yes	none	High gas pressure relieved on DS-009, 010, and 011-91	
9-3-91	2:00 pm GWFranklin	Solid	yes	none	High gas pressure relieved on DS-009, 010, and 011-91	

Daily Safety Equipment and Facility Inspection Log

Date / Inspector / Item	Goggles	Respirators	Safety Gloves	Gloves	Lab Coat or Overalls	Apron	Fire Extinguishers in place	Fire Blanket	Acid Neutralizer	Base Neutralizer	Sand w/ 10% Soda Ash	Plastic Bags	Spill Cart Supplies	Emergency Power Equipment	Main Power Unit	Hood Exhaust Switch	Shower	Eyewash Fountain	Face Shields	Body Shields	Scott Lab-Pak	Storage Containers	Distillation Appar.	* Room Order	Remarks
1-6-92 David McDonald	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	N/A	N/A	✓	✓	N/A	GOOD	None
1-7-92 Joe Nelson	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	N/A	N/A	✓	✓	N/A	GOOD	None

* Report excessive clutter in the [illegible]

Daily Safety Equipment and Facility Inspection Log

Item / Date / Inspector	Goggles	Respirators	Safety Gloves	Gloves	Lab Coat or Overalls	Apron	Fire Extinguishers in place	Fire Blanket	Acid Neutralizer	Base Neutralizer	Sand w/ 10% Soda Ash	Plastic Bags	Spill Cart Supplies	Emergency Power Equipment	Main Power Unit	Hood Exhaust Switch	Shower	Eyewash Fountain	Face Shields	Body Shields	Scott Lab-Pak	Storage Containers	Distillation Appar.	* Room Order *	Remarks
Hsing Zhou 12-12-91	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	N/A	✓	
Hsing Zhou 12-13-91	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	N/A	✓	

* Report excessive clutter in the [illegible]

Daily Safety Equipment and Facility Inspection Log

Date / Inspector	Goggles	Respirators	Safety Gloves	Gloves	Lab Coat or Overalls	Apron	Fire Extinguishers in place	Fire Blanket	Acid Neutralizer	Base Neutralizer	Sand w/ 10% Soda Ash	Plastic Bags	Spill Cart Supplies	Emergency Power Equipment	Main Power Unit	Hood Exhaust Switch	Shower	Eyewash Fountain	Face Shields	Body Shields	Scott Lab-Pak	Storage Containers	Distillation Appar.	Room Order *	Remarks
Hing Zhou 12-3-91	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	N/A	✓	✓	✓	N/A	✓	
Hing Zhou 12-4-91	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	N/A	✓	✓	✓	N/A	✓	
Hing Zhou 12-5-91	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	N/A	✓	✓	✓	N/A	✓	
Hing Zhou 12-6-91	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	N/A	✓	✓	✓	N/A	✓	
Hing Zhou 12-9-91	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	N/A	✓	
Hing Zhou 12-10-91	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	N/A	✓	
Hing Zhou 12-1[illegible]-91	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	N/A	✓	

* Report [illegible]

Daily Safety Equipment and Facility Inspection Log

Item / Date / Inspector	Goggles	Respirators	Safety Gloves	Gloves	Lab Coat or Overalls	Apron	Fire Extinguishers in place	Fire Blanket	Acid Neutralizer	Base Neutralizer	Sand w/ 10% Soda Ash	Plastic Bags	Spill Cart Supplies	Emergency Power Equipment	Main Power Unit	Hood Exhaust Switch	Shower	Eyewash Fountain	Face Shields	Body Shields	Scott Lab-Pak	Storage Containers	Distillation Appar.	* Room Order	Remarks
Hing Zhou 11-18-91	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	
Hing Zhou 11-19-91	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	
Hing Zhou 11-20-91	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	
Hing Zhou 11-21-91	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	
Hing Zhou 11-22-91	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	
Hing Zhou 12-2-91	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	

* Report excessive clutter in the Work Area

Daily Safety Equipment and Facility Inspection Log

Item / Date / Inspector	Goggles	Respirators	Safety Gloves	Gloves	Lab Coat or Overalls	Apron	Fire Extinguishers in place	Fire Blanket	Acid Neutralizer	Base Neutralizer	Sand w/ 10% Soda Ash	Plastic Bags	Spill Cart Supplies	Emergency Power Equipment	Main Power Unit	Hood Exhaust Switch	Shower	Eyewash Fountain	Face Shields	Body Shields	Scott Lab-Pak	Storage Containers	Distillation Appar.	* Room Order *	Remarks
Ming Zhou 11-7-91	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	N/A	✓	✓	✓	✓	N/A	✓	
Ming Zhou 11-8-91	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	-	✓	✓	✓	N/A	✓	✓	✓	✓	N/A	✓	
Ming Zhou 11-11-91	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	N/A	✓	✓	✓	✓	N/A	✓	
Ming Zhou 11-12-91	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	N/A	✓	✓	✓	✓	N/A	✓	
Ming Zhou 11-13-91	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	N/A	✓	✓	✓	✓	N/A	✓	
Ming Zhou 11-14-91	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	N/A	✓	✓	✓	✓	N/A	✓	
Ming Zhou 11-15-91	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	N/A	✓	✓	✓	✓	N/A	✓	

* Report

Daily Safety Equipment and Facility Inspection Log

Item / Date / Inspector	Goggles	Respirators	Safety Gloves	Gloves	Lab Coat or Overalls	Apron	Fire Extinguishers in place	Fire Blanket	Acid Neutralizer	Base Neutralizer	Sand w/ 10% Soda Ash	Plastic Bags	Spill Cart Supplies	Emergency Power Equipment	Main Power Unit	Hood Exhaust Switch	Shower	Eyewash Fountain	Face Shields	Body Shields	Scott Lab-Pak	Storage Containers	Distillation Appar.	* Room Order *	Remarks
Ning Zhou 10-29-91	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	N/A	✓	✓	✓	N/A	✓	
Ning Zhou 10-30-91	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	N/A	✓	✓	✓	N/A	✓	
Ning Zhou 10-31-91	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	N/A	✓	✓	✓	N/A	✓	
Ning Zhou 11-1-91	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	—	✓	✓	✓	N/A	✓	✓	✓	N/A	✓	
Ning Zhou 11-4-91	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	N/A	✓	✓	✓	N/A	✓	
Ning Zhou 11-5-91	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	N/A	✓	✓	✓	N/A	✓	
Ning Zhou 11-6-[redacted]	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	N/A	✓	✓	✓	N/A	✓	

* Report excessive clutter in the Waste [redacted]

Daily Safety Equipment and Facility Inspection Log

Item / Date / Inspector	Goggles	Respirators	Safety Gloves	Gloves	Lab Coat or Overalls	Apron	Fire Extinguishers in place	Fire Blanket	Acid Neutralizer	Base Neutralizer	Sand w/ 10% Soda Ash	Plastic Bags	Spill Cart Supplies	Emergency Power Equipment	Main Power Unit	Hood Exhaust Switch	Shower	Eyewash Fountain	Face Shields	Body Shields	Scott Lab-Pak	Storage Containers	Distillation Appar.	Room Order *	Remarks
Ming Zhou 10-18-91	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	N/A	✓	✓	✓	N/A	✓	
Ming Zhou 10-21-91	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	N/A	✓	✓	✓	N/A	✓	
Ming Zhou 10-22-91	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	N/A	✓	✓	✓	N/A	✓	
MING Zhou 10-23-91	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	N/A	✓	✓	✓	N/A	✓	
Ming Zhou 10-24-91	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	N/A	✓	✓	✓	N/A	✓	
Ming Zhou 10-25-91	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	N/A	✓	✓	✓	N/A	✓	
Ming Zhou 10-28-91	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	N/A	✓	✓	✓	N/A	✓	

* Report ...

Daily Safety Equipment and Facility Inspection Log

Date / Inspector / Item	Goggles	Respirators	Safety Gloves	Gloves	Lab Coat or Overalls	Apron	Fire Extinguishers in place	Fire Blanket	Acid Neutralizer	Base Neutralizer	Sand w/ 10% Soda Ash	Plastic Bags	Spill Cart Supplies	Emergency Power Equipment	Main Power Unit	Hood Exhaust Switch	Shower	Eyewash Fountain	Face Shields	Body Shields	Scott Lab-Pak	Storage Containers	Distillation Appar.	* Room Order *	Remarks
Ning Zhou 10/9	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	N/A	✓	✓	✓	N/A	✓	
Ning 10/10	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	N/A	✓	✓	✓	N/A	✓	
Ning Zhou 10/10	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	N/A	✓	✓	✓	N/A	✓	
Ning Zhou 14/10	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	N/A	✓	✓	✓	N/A	✓	
Ning Zhou 15/10	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	N/A	✓	✓	✓	N/A	✓	
Ning Zhou 16/10	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	N/A	✓	✓	✓	N/A	✓	
Ning Zhou 17/10	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	N/A	✓	✓	✓	N/A	✓	

Daily Safety Equipment and Facility Inspection Log

Date / Inspector / Item	Goggles	Respirators	Safety Gloves	Gloves	Lab Coat or Overalls	Apron	Fire Extinguishers in place	Fire Blanket	Acid Neutralizer	Base Neutralizer	Sand w/ 10% Soda Ash	Plastic Bags	Spill Cart Supplies	Emergency Power Equipment	Main Power Unit	Hood Exhaust Switch	Shower	Eyewash Fountain	Face Shields	Body Shields	Scott Lab-Pak	Storage Containers	Distillation Appar.	* Room Order	Remarks
9/30 Dave	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	N/A	✓	✓	✓	N/A	✓	
10/1 Ning Zhou	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	N/A	✓	✓	✓	N/A	✓	
10/2 Ning Zhou	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	N/A	✓	✓	✓	N/A	✓	
10/3 Ning Zhou	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	N/A	✓	✓	✓	N/A	✓	
10/4 Ning Zhou	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	N/A	✓	✓	✓	N/A	✓	
10/7 Ning Zhou	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	N/A	✓	✓	✓	N/A	✓	
10/8 Ning Zhou	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	N/A	✓	✓	✓	N/A	✓	

* Report excessive clutter in the [illegible]

Daily Safety Equipment and Facility Inspection Log

Date / Inspector / Item	Goggles	Respirators	Safety Gloves	Gloves	Lab Coat or Overalls	Apron	Fire Extinguishers in place	Fire Blanket	Acid Neutralizer	Base Neutralizer	Sand w/ 10% Soda Ash	Plastic Bags	Spill Cart Supplies	Emergency Power Equipment	Main Power Unit	Hood Exhaust Switch	Shower	Eyewash Fountain	Face Shields	Body Shields	Scott Lab-Pak	Storage Containers	Distillation Appar.	* Room Order *	Remarks
8-12-91 Dave Mc	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	N/A	✓	
8-13-91 Dave Mc	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	N/A	✓	
8-14-91 Dave Mc	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	N/A	✓	
8-15-91 GWFrankl	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	n/a	✓	
8-16-91 Dave Mc	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	N/A	✓	

* Report excessive clutter in the Work

Daily Safety Equipment and Facility Inspection Log

Date / Item / Inspector	Goggles	Respirators	Safety Gloves	Gloves	Lab Coat or Overalls	Apron	Fire Extinguishers in place	Fire Blanket	Acid Neutralizer	Base Neutralizer	Sand w/ 10% Soda Ash	Plastic Bags	Spill Cart Supplies	Emergency Power Equipment	Main Power Unit	Hood Exhaust Switch	Shower	Eyewash Fountain	Face Shields	Body Shields	Scott Lab-Pak	Storage Containers	Distillation Appar.	Room Order *	Remarks
8-5-91 David McDonald	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	N/A	✓	
8-6-91 David McDonald	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	N/A	✓	
8-7-91 David McDonald	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	N/A	✓	
8-8-91 David McDonald	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	N/A	✓	
8-9-91 David McDonald	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	N/A	✓	

* Report exceptions

Daily Safety Equipment and Facility Inspection Log

Item / Date / Inspector	Goggles	Respirators	Safety Gloves	Gloves	Lab Coat or Overalls	Apron	Fire Extinguishers in place	Fire Blanket	Acid Neutralizer	Base Neutralizer	Sand w/ 10% Soda Ash	Plastic Bags	Spill Cart Supplies	Emergency Power Equipment	Main Power Unit	Hood Exhaust Switch	Shower	Eyewash Fountain	Face Shields	Body Shields	Scott Lab-Pak	Storage Containers	Distillation Appar.	* Room Order *	Remarks
8-5-91 David McDonald	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	N/A		- can't ok. shower
8-6-91 David McDonald	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	N/A		
8-7-91 David McDonald	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	–	✓	✓	✓	✓	✓	✓	✓	✓	N/A		
8-8-91 David McDonald	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	N/A		
8-9-91 David McDonald	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	N/A		
																	↑								

* Report exposed

FYI, Dr. Wilbraham
↳ File

Daily Safety Equipment and Facility Inspection Log

Date	Inspector	Item	Date	Date Check	Date when Inspected.	Date	Date	Remarks
7-26		Goggles						10 goggles
7-26		Respirators						2 clean/1 dirty John has one under desk. He has been warned
7-26		Safety Gloves						Nitrile / ~~Latex~~ Exam Gloves about this.
		~~Zetec Gloves~~						
7-26		Lab Coat or Overalls						All hung up in proper place.
7-26		Apron						Available
7-26		Fire Extinguishers in place						OK.
7-26		Fire Blanket						OK.
7-26		Acid Neutralizer						OK.
7-26		Base Neutralizer						OK.
7-26		Sand w/ 10% Soda Ash						OK
7-26		Plastic Bags						OK
7-26		Spill Cart Supplies						OK.
7-26		Emergency Power Equipment						Works.
7-26		Main Power Unit						OK
7-26		Hood Exhaust Switch						OK
7-26		Shower						OK / Can't check.
7-26		Eyewash Fountain						OK
7-26		Face Shields						Available
7-26		Body Shields						✓
7-26		Scott Lab-Pak						6-26 - Last ck. of operation.
7-26		Storage Containers						Vermiculite on Floor / Drums Unlabeled (Very Poor!)
7-26		Distillation Appar.						N/A
7-26		* Room Order						Poor Fair Good Excellent People are not putting things in proper places.

* Report excessive clutter in the Waste Management Area.

Daily Safety Equipment and Facility Inspection Log

Date	Inspector	Item	Date	Date Check	Date when Inspected.	Date	Date	Remarks A - Available N.A. - Not Available
7-29	[signature]	Goggles						A
7-29	[signature]	Respirators						A 3 cleaned & in cabinet
7-29	[signature]	Safety Gloves						A
		~~Zetec Gloves~~						
7-29	[signature]	Lab Coat or Overalls						A
7-29	[signature]	Apron						A
7-29	[signature]	Fire Extinguishers in place						A
7-29	[signature]	Fire Blanket						A
7-29	[signature]	Acid Neutralizer						A
7-29	[signature]	Base Neutralizer						A
7-29	[signature]	Sand w/ 10% Soda Ash						A
7-29	[signature]	Plastic Bags						A
7-29	[signature]	Spill Cart Supplies						A
7-29	[signature]	Emergency Power Equipment						A
7-29	[signature]	Main Power Unit						A
7-29	[signature]	Hood Exhaust Switch						Working
7-29	[signature]	Shower						A / (Unable to Verify
7-29	[signature]	Eyewash Fountain						A Working
7-29	[signature]	Face Shields						A
7-29	[signature]	Body Shields						A
7-29	[signature]	Scott Lab-Pak						A
7-29	[signature]	Storage Containers						Unlabeled Drums -
~~7-29~~	~~[signature]~~	~~Distillation Appar.~~						
7-29	[signature]	* Room Order						Fair → Wastes need logged in.

* Report excessive clutter in the Waste Management Area.

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION V

DATE: MAR 04 1991

SUBJECT: RCRA Inspection at Southern Illinois University, Edwardsville, Illinois (ILD006331342) (AGD102:13)

FROM: Gerald R. Golubski, Environmental Engineer
Central District Office (5SCDO)

TO: William E. Muno, Chief
RCRA Enforcement Branch (5HE)

THRU: Willie H. Harris, Chief
Central District Office (5SCDO)

On February 15, 1991, a RCRA inspection was conducted at this state operated university. This inspection was pursuant to your office's request for inspections during FY'91. The University was represented by Dr. Anthony C. Wilbraham, Professor of Chemistry. The Illinois EPA was notified that an inspection was to take place at this time, however, they did not participate.

Background

Hazardous waste generated on campus are mostly from teaching activities and from the physical plant (which consists of the paint shop, woodshop, etc.). The Laboratory wastes are mostly chlorinated and nonchlorinated solvents (F Solvents), waste corrosives (acids and bases) and minor amounts of EP Toxics (due to their metals content). The physical plant will generate a 55 gallon drum each year of paint and paint thinner wastes.

The University containerizes each wastes into 55 gallon drums for offsite disposal. However, some minor amounts of wastes treatment occurs in a dedicated Lab located within the Chemistry Building. This essentially consists of acid and base neutralization of corrosives and also some waste reduction by precipitation. In addition, minor amounts of some wastes (a few gallons each year) are treated by oxidation or reduction in order to make them non-hazardous.

This treatment of wastes is performed by chemistry graduate students who have a comprehensive knowledge of the chemical reactions involved in this task. In addition, they also record within a laboratory logbook, the amount of wastes treated each day as well as the necessary tests performed in order to assure that the reactions go to completion. Moreover, at the time of this most recent inspection, this data was being entered into a computer for better information management.

TSD Storage Room

At the time of this inspection, there were three 55 gallon drums and several shelves of hazardous waste in storage. These wastes were in containers that were stored closed and were in good condition. There was no evidence of any releases (spills) within the storage room.

Teaching Labs

Several teaching Labs were again inspected for accumulation of hazardous wastes. As noted in last years U.S. EPA Inspection Report, the University was deficient for accumulating hazardous waste in open containers which were unlabeled. It is apparent that the University has improved upon labeling and removing waste containers from these Labs in a more timely manner, however, several Labs still had open containers. Although, the number of open containers within the Labs was significantly less than last year however, approximately a dozen such open containers were still present.

Physical Plant

The physical plant building was also inspected at this time. It appeared that the only drum of hazardous waste in storage consisted of a single 55 gallon drum of waste paint. This drum was properly labeled, stored closed and had an accumulation date affixed. At the time of the inspection, the drum was only half filled.

It should be noted that the physical plant also recycles their used motor oils. A special waste hauler (Ace Oil Services Ltd. of Glencoe, Missouri) routinely picks up used oils on site. At the time of this inspection, the oil drums on site were empty, since the recycler had recently made a service call.

RCRA Training

Last annual RCRA training occurred on November 8, 1990. Facility records indicate that the student aids involved in the RCRA program received their annual training at that time. They include John Schaund, Carol Ray, Patienice MBoe, Michele Panker, Pat Willen, Arnold Davis, Steve Gunther, Vivian Schneider, and Claudine Hutchinson. Also noted within these records were that further training in the use of air packs, respirators, and hazardous communications were also taught in October 1990.

Waste Minimization

In an effort to minimize hazardous wastes at the University, they have adopted the use of water base soluble latex paints (instead of chemical solvent base paints) which no longer require paint thinners. In addition, inorganic liquid mixtures are precipitated and collected. The solute is allowed to be discharged to the University's wastewater treatment plant after the precipitate is removed by settling or filtration.

Manifests

In 1990 a total of six offsite shipping manifests were prepared. They were all signed and returned within one month. Each manifest appeared to be properly completed. Appropriate Land Ban notifications forms (including treatment standards) were included when necessary.

Attached is a completed Illinois Hazardous Wastes Inspection Report form and Land Ban Disposal Restriction Report form. Also provided is the University's last annual report as submitted to the Illinois EPA (1989).

If you have any questions regarding this inspection, please call me at 886-1968.

Attachments

JUL 3 0 1990

5HR-12

Glen Savage, Manager
Field Operations Section
Illinois Environmental Protection Agency
2200 Churchill Road
Springfield, Illinois 62706

Re: University of Illinois
Carbondale-ILD 071 965 214
and Edwardsville-ILD 006 331 342

Dear Mr. Savage:

Please find enclosed copies of inspection reports for the above-referenced facilities for your information. These inspections were conducted by the United States Environmental Protection Agency (U.S. EPA) under Section 3007 of the Resource Conservation and Recovery Act (RCRA), which grants U.S. EPA primary responsibility for ensuring the compliance of State facilities under its jurisdiction. These inspections were conducted on May 15, 1990, and February 14, 1990, respectively.

U.S. EPA understands that the Illinois Environmental Protection Agency conducted a Compliance Evaluation Inspection (CEI) at the Carbondale facility on March 26 and 27, 1990, and has initiated enforcement action by issuing a Pre-Enforcement Conference Letter (PECL) on May 9, 1990.

Please feel free to contact Barbara Russell of my staff at (312) 353-7922, if you have any questions.

Sincerely yours,

Paul E. Dimock, Chief
IL/MI/WI Enforcement Program Section

Enclosures

cc: William Radlinski, IEPA

5HR-12:B. RUSSELL:or:3:7925:7/16/90:dISK# 1:FILENAME:savage

OR 7/27/90

RCRA ENFORCEMENT	RPB STAFF	
INIT.	BR	PEA
DATE	7/30/90	7-30-90

JUL 0 6 1990

5HR-12

Antony Wilbraham, Ph.D.
Professor of Chemistry
Southern Illinois University
P.O. Box 1652
Edwardsville, Illinois 62026

Re: Southern Illinois University
(Edwardsville)
ILD 006 331 342

Dear Dr. Wilbraham:

The United States Environmental Protection Agency (U.S. EPA) has reviewed your letter dated June 13, 1990. That letter documented actions taken by the above-referenced facility to correct violations identified in our Notice of Violation dated June 8, 1990. The actions stated in your letter appear to adequately address the violations.

Your cooperation and efforts in this matter are greatly appreciated. Please feel free to contact Ms. Barbara Russell of my staff at (312) 353-7922, if you have any further questions.

Sincerely yours,

William E. Muno, Chief
RCRA Enforcement Branch

cc: Glen Savage, IEPA
Mike Grant, IEPA, Collinsville
Dr. Benjamin Quillian, SIUE
Jay Patrick, SIUE
Dr. Emil F. Jason, SIUE

OR 7/3/90 SV 7-5-90

RCRA ENFORCEMENT	RCB STAFF	RCB SECTION CHIEF	RCB CHIEF
INIT. DATE	BR 7/4/90	7-3-90	7/5/90

5HR-12:B. RUSSELL:or:3:7925:7/2/90:dISK# 1:FILENAME:WILBRAHA

SIUE Southern Illinois University at Edwardsville

School of Sciences
Department of Chemistry

June 13, 1990

Mr. William E. Muno
RCRA Enforcement Branch
United States Environmental Protection Agency
Region 5
230 South Dearborn Street
Chicago, IL 60604

ATTENTION: 5HR-12

RE: Notice of Violation
Southern Illinois University at Edwardsville
ILD 006 331 342

Dear Sir:

The following actions have been taken to correct the violations cited in the report by Mr. Gerald Golubski following inspections of Southern Illinois University at Edwardsville on February 14, and March 8, 1990.

Violation #1 (Section 275.271) was addressed immediately after the first visit. The contents of the leaking pail were transferred to a 55 gal drum and the area was cleaned.

Violation #2 (Sections 275.115 and 275.274) have been corrected. Daily safety checks and weekly drum checks are now being conducted. The completed reports are kept on file with the secretary. Replacement safety items (spill pillows and organic vapor filters, for example) have been ordered to keep the inventory complete.

Violation #3 as indicated in your Notice of Violation has been adequately addressed. (A summary statement of our training program and reference materials is attached.)

Violation #4 (Section 725.273) the hazardous waste personnel and the teaching assistants in the laboratories have been advised to check frequently that containers of chemical wastes in the hoods are kept closed except for filling or emptying.

Violation #5 (Section 722.134) has been addressed and greater care is being taken to identify the contents and accumulation dates of "satellite" hazardous waste containers. Personnel are also encouraged to reduce the number and volume of waste containers in their laboratories.

Copies of the 1989 Facility and Generator Activity Hazardous Wastes reports are enclosed as requested.

Please let me know if I can be of further assistance in this matter.

Sincerely,

Antony C. Wilbraham
Acting Director
Hazardous Waste Mangement

ACW/paw

cc: Dr. Benjamin Quillian, Vice President for Admin., SIUE
Mr. Mike Grant, IL EPA, Collinsville
Mr. Jay Patrick, SIUE
Dr. Emil F. Jason, SIUE
Hazardous Waste Lab Personnel

Enclosures

TRAINING SUMMARY

Title 35: ENVIRONMENTAL PROTECTION WASTE DISPOSAL

PERSONNEL TRAINING (35 Ill. Adm. Code Part 725.116)

The program of instruction includes the following:

1. Procedures for Handling Hazardous Chemicals:
   Flammables, Corrosives, Reactives, Health Toxins

2. Procedures for Handling Spills:
   Acids, Bases, Organic Solids, Organic Liquids

3. Chemical Safety Measures:
   Protective Apparel, Safety Equipment, Emergency Procedures, First Aid

4. Procedures for Storing Chemicals in Laboratories

5. Procedures for Disposing of Waste Chemicals from Laboratories:
   Incineration, Sewer Disposal, Landfill, Recycling, Transportation, Uniform Hazardous Waste Manifest

6. Record Keeping:
   Operational Log, Daily Safety Check Log, Weekly Drum Inspection Log

7. Hazard Communication Standard:
   Right-To-Know Law, Material Safety Data Sheets (MSDS)

8. SIUE Contingency Plans and Emergency Procedures:
   Use and care of emergency equipment, Alarm Systems, Response to Fires or Explosives

9. Documents and Records at the RCRA Management Facility:
   a. Job titles for each position and the name of each employee filling each job.

   b. Written job description for each position including requisite skill, education or other qualifications and duties of employees assigned to each position.

   c. Records that document that the training or job experience has been given to, and completed by, facility personnel.

Selected Bibliography of Materials

Available for Use in the Training Program

Books/References

"Prudent Practices for Handling Hazardous Chemicals in Laboratories". National Research Council, 1983.

"Prudent Practices for Disposal of Chemicals from Laboratories". National Research Council, 1983.

"Flinn Chemical Catalog Reference Manual", Flinn Scientific, Batavia, IL 60510, 1988.

"Hazardous Chemicals - Information and Disposal Guide", Margaret-Ann Armour, et.al., Eds., University of Alberta, Canada, 1987.

"Hazards in the Chemical Laboratory", L Bretherick, Ed., The Royal Society of Chemistry, London, 1981.

"Emergency Response Guidebook", US.DOT, 1987.

"Safe Storage of Laboratory Chemicals", David Pipetore, Ed., J. Wiley and Sons, 1984.

"Occupational Health Guidelines for Chemical Hazards", NIOSH/OSHA, 3 vols.

"Code of Federal Regulations", 40 CFR Protection of the Environment.

"Illinois EPA Title 35: Environmental Protection Rules and Regulations", 1987.

Films

"You Can Work Safely with Toxic Substances", Slides/Audio Cassette 17 min., Carnow, Conibear and Associates Ltd., Illinois 60606, 1983.

"Twenty-Eight Grams of Prevention", 16 mm movie, 15 min., Fisher Scientific Company, General Laboratory Safety.

12 DEC 1988

5HR-12

Dr. Antony C. Wilbraham
Acting Director
Hazardous Waste Management
Southern Illinois University-Edwardsville
P.O. Box 1151
Edwardsville, Illinois 62026

Re: Southern Illinois University
ILD 006 331 342

Dear Dr. Wilbraham:

The United States Environmental Protection Agency (U.S. EPA) has reviewed your letter dated October 18, 1988. That letter documented actions taken by the above-referenced facility to correct violations identified in our Notice of Violation dated September 22, 1988. The actions stated in your letter appear to adequately address those violations. Also, please note that in your letter, you list the U.S. EPA I.D. number as ILD 006 331 343, that number is incorrect. The correct number is ILD 006 331 342.

Your cooperation and efforts in this matter are greatly appreciated. Please feel free to contact Ms. Barbara Russell of my staff at (312) 353-7922 if you have any further questions.

Sincerely yours,

William E. Muno, Chief
RCRA Enforcement Branch

cc: B. Quillian, SIUE
J. Patrick, SIEU
H. Chappel, IEPA
G. Savage, IEPA
M. Grant, IEPA, Collinsville

12/8/88

RCRA ENFORCEMENT	RE ST.	[illegible] SECTION CHIEF	REB CHIEF
INIT.			
DATE	12/6/88	12-7-88	

12/7/88

SIUE Southern Illinois University at Edwardsville

School of Sciences
Department of Chemistry

October 18, 1988

Mr. William E. Muno
RCRA Enforcement Branch
United States Environmental Protection Agency
Region 5
230 South Dearborn Street
Chicago, IL 60604

ATTENTION: 5HR-12

RE: Notice of Violation, Southern Illinois University (SIU)
ILD006331343

Dear Sir:

The following actions have been taken to correct the violations cited in the report by Mr. Gerald Golubski following an inspection of Southern Illinois University at Edwardsville on May 27, 1988.

1. An Annual Report has been submitted to the State as required by 725.175. A copy is enclosed for your files.

2. A greater effort will be made to ensure that hazardous waste containers are kept closed except when being filled or emptied as required by 725.273(a).

3. All personnel involved in the RCRA management facility have completed a training program or will receive training within six months after the date of their employment as required by 725.116. A copy of the program of instruction is enclosed for your information.

Please let me know if you need further information.

Sincerely,

Antony C. Wilbraham
Acting Director
Hazardous Waste Management

ACW/11

cc: Dr. Benjamin Quillian, Vice President for Administration, SIUE
Mr. Mike Grant, IL EPA, Collinsville
Mr. Jay Patrick, SIUE

Enclosures

SENDER: Complete items 1 and 2 when additional services are desired, and complete items 3 and 4.

Put your address in the "RETURN TO" space on the reverse side. Failure to do this will prevent this card from being returned to you. The return receipt fee will provide you the name of the person delivered to and the date of delivery. For additional fees the following services are available. Consult postmaster for fees and check box(es) for additional service(s) requested.

1. ☒ Show to whom delivered, date, and addressee's address. 2. ☐ Restricted Delivery.

3. Article Addressed to:

Dr. Anthony Wilbraham
Professor of Chemistry
Southern Illinois University
Edwardsville
P.O. Box 1151
Edwardsville, IL 62026

4. Article Number
P 487 467 808

Type of Service:
☐ Registered ☐ Insured
☒ Certified ☐ COD
☐ Express Mail

Always obtain signature of addressee or agent and DATE DELIVERED.

5. Signature – Addressee
X

6. Signature – Agent
X A. Carroll

7. Date of Delivery
9-28-88

8. Addressee's Address *(ONLY if requested and fee paid)*

USPO SEP 28 1988 BR. EDWARDSVILLE, IL SUB

PS Form 3811, Feb. 1986 DOMESTIC RETURN RECEIPT

UNITED STATES POSTAL SERVICE
OFFICIAL BUSINESS

SENDER INSTRUCTIONS
Print your name, address, and ZIP Code in the space below.
- Complete items 1, 2, 3, and 4 on the reverse.
- Attach to front of article if space permits, otherwise affix to back of article.
- Endorse article "Return Receipt Requested" adjacent to number.

PENALTY FOR PRIVATE USE. $300

RETURN TO

Print Sender's name, address, and ZIP Code in the space below.

Ms. Barbara Russell (5HR-12)

UNITED STATES OF AMERICA
ENVIRONMENTAL PROTECTION AGENCY
230 S. DEARBORN
CHICAGO IL 60604

Barbara Russell - 5HE-12

P-487 467 808

Dr. Anthony Wilbraham,
P.O. Box 1151
Edwardsville, IL 62026

2.00
85

90

4.13

CERTIFIE [illegible] (see front)

1. If you want [illegible] the receipt [illegible] return address leaving the receipt att[illegible] your rural carrier. (no extra charge)

2. If you do no[illegible] the return address of the article, dat[illegible] article.

3. If you want a return receipt, [illegible] on a return receipt card, F[illegible] space permits. Otherwise, [illegible] to back of article [illegible] adjacent to the number.

4. If you want delivery restricted to the addressee, or to an authorized agent of the addressee, endorse RESTRICTED DELIVERY on the front of the article.

5. Enter fees for the services requested in the appropriate spaces on the front of this receipt. If return receipt is requested, check the applicable blocks in [illegible] Form 3811.

6. Save this receipt and present it if you make inquiry.

CONVERSATION RECORD

TIME: 9:30 a.m.

DATE: 10/12/88

TYPE: ☐ VISIT ☐ CONFERENCE ☒ TELEPHONE ☐ INCOMING ☒ OUTGOING

Location of Visit/Conference:

NAME OF PERSON(S) CONTACTED OR IN CONTACT WITH YOU	ORGANIZATION (Office, dept., bureau, etc.)	TELEPHONE NO: 618
Dr. Anthony Wilbraham	SIU-Edwardsville	692-3562

ROUTING	
NAME/SYMBOL	INT

SUBJECT: NOV dated 9/22/88

SUMMARY: Mr. Wilbraham requested an additional 10 days to comply with the above-mentioned NOV. Mr. Wilbrahams reasoning for an extension was due to illness and travel. He had just returned to his office. I granted a 10 day extension. Facility is required to RTC by November 1, 1988.

ACTION REQUIRED

None

NAME OF PERSON DOCUMENTING CONVERSATION	SIGNATURE	DATE
Barbara J. Russell	Barbara J. Russell	10/12/88

ACTION TAKEN

SIGNATURE	TITLE	DATE

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION V

DATE: SEP 22 1988

SUBJECT: Evaluation of ESD Product

FROM: Barbara Russell BR
IL/MI/WI Enforcement Programs Section

TO: Willie H. Harris, Chief
Central Distric Office (5SCDO)

THRU: William E. Muno, Chief ORIGINAL SIGNED BY
RCRA Enforcement Branch WILLIAM E. MUNO

Attached you will find a copy of the ESD Evaluation Form for a RCRA Compliance Evaluation Inspection conducted at the University of Illinois (Edwardsville), Edwardsville, Illinois on May 27, 1988. As a result of our review of the inspection report, a Notice of Violation Letter was prepared.

If you have any further questions, please contact me at (312) 353-7922.

Attachment

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION V

DATE: SEP 22 1988

SUBJECT: Evaluation of ESD Product

FROM: Barbara Russell BR
IL/MI/WI Enforcement Programs Section

TO: Willie H. Harris, Chief
Central Distric Office (5SCDO)

THRU: William E. Muno, Chief
RCRA Enforcement Branch

ORIGINAL SIGNED BY
WILLIAM E. MUNO

Attached you will find a copy of the ESD Evaluation Form for a RCRA Compliance Evaluation Inspection conducted at the University of Illinois (Edwardsville), Edwardsville, Illinois on May 27, 1988. As a result of our review of the inspection report, a Notice of Violation Letter was prepared.

If you have any further questions, please contact me at (312) 353-7922.

Attachment

9/9/88

	TYP.	AUTH.	IL/IN TECH. ENF. SEC.	MI/WI TECH. ENF. SEC.	OH/MN TECH. ENF. SEC.	IL/MI/WI ENF. PROG. SECTION	IN/MN/OH ENF. PROG. SECTION	RCRA ENF. BR. CHIEF	O.R. A.D.D.	WMD DIR
INIT. DATE	B.R 9/16/88	BR 9/16/88	9/16					WEM 9/20/88		

EPA FORM 1320-6 (REV. 3-76)

SEP 2 2 1988

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

5HR-12

Dr. Anthony Wilbraham
Professor of Chemistry
Southern Illinois University
Edwardsville
P.O. Box 1151
Edwardsville, Illinois 62026

Re: Notice of Violation
Southern Illinois University (SIU)
ILD 006 331 342

Dear Dr. Wilbraham:

On May 27, 1988, an inspection of Southern Illinois University (SIU) was conducted by a representative of the United States Environmental Protection Agency (U.S. EPA). Under Section 3007 of the Resource Conservation and Recovery Act (RCRA), U.S. EPA has been granted the primary responsibility for ensuring the compliance of State facilities under its jurisdiction.

The purpose of the inspection was to determine if SIU was in compliance with the State equivalent requirements of Subtitle C of RCRA, as amended, 42 U.S.C. §6901 et seq. The State requirements are found at 35 Ill. Adm. Code Part 720 et seq. In addition, a land ban inspection checklist was also completed. The purpose of this portion of the inspection was to determine the compliance status of your facility with respect to the land disposal restrictions for F001-F005 spent solvents which became effective on November 8, 1986, (40 CFR Part 2268, and revisions to 40 CFR Parts 260-265 and 270-271) and for "California List" hazardous waste on July 8, 1987, (52 Federal Register 25760: revisions to 40 CFR Parts 262, 264, 265, 268, and 270-271). A copy of the complete inspection report is enclosed for your information.

As a result of the inspection, the following violations have been identified:

1. Failure to assure that all personnel involved in the RCRA management program receive training as required by 725.116;

2. Failure to submit a copy of an Annual Report to the State by March 1, 1988, as required by 725.175; and

3. Failure to store hazardous waste in closed containers, as required by 725.273(a).

In addition, it was also noted during the inspection, that a shipment to Texas appeared on an Indiana manifest. In the future please make sure that correct manifest forms are used.

You are hereby requested to submit within thirty (30) calendar days from the date of this letter a written description of the actions taken to correct the aforementioned violations. Failure to correct the violations may subject the facility to further Federal enforcement actions.

If you have any questions, please contact Ms. Barbara Russell of my staff at (312) 353-7922.

Sincerely yours,

ORIGINAL SIGNED BY
WILLIAM E. MUNO

William E. Muno, Chief
RCRA Enforcement Branch

Enclosure

cc: T. Patrick, SIU
H. Chappell, IEPA
G. Savage, IEPA

bcc: William Franz, ERB

	TYP.	AUTH.	IL/IN TECH. ENF. SEC.	MI/WI TECH. ENF. SEC.	OH/MN TECH. ENF. SEC.	IL/MI/WI ENF. PROG. SECTION	IN/MN/OH ENF. PROG. SECTION	RCRA ENF. BR. CHIEF	O. R. A.D.D.	WMD DIR
INIT. DATE	8/22/88	8/24/88				8-22-88		9/10/88		

9/9/88

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION V

DATE: 30 JUN 1988

SUBJECT: RCRA Inspection, Southern Illinois University at Edwardsville, Illinois (ILD006331342) (IL90255002) (C28109)

FROM: Gerald R. Golubski, Environmental Engineer
Central District Office (5SCDO)

TO: William E. Muno, Chief
RCRA Enforcement Section (5HE)

THRU: Willie H. Harris, Chief
Central District Office (5SCDO)

On May 27, 1988, a RCRA inspection was conducted at this State University located in Edwardsville, Illinois. This inspection is in response to your office's request for inspections during FY'88. The facility was represented by Dr. Anthony Wilbraham, Professor of Chemistry. The Illinois EPA was notified that an inspection was to have taken place at this time; however, they did not participate.

BACKGROUND

Southern Illinois University is a State operated learning institution. Hazardous wastes are generated mostly from teaching laboratories and by research activities. In addition, the physical plant consisting of a paint shop, vehicle maintenance garage, and office equipment cleaning station also generate hazardous wastes and materials.

Currently, any hazardous wastes paint solvents (consisting of methyl ethyl ketone and methyl Isobutyl Ketone) is manifested across the state highway to the chemistry building. The chemistry building has a designated hazardous wastes container storage area. This storage area is also used to store chemicals for future experiments. The University has contracted out an oils recovery company to recycle the crankcase oils generated in the garage. The cleaning solvents from the office equipment cleaning station is also recycled. These solvents are re-distilled in the chemistry building. The distillate is returned for re-use at the station. Any residues are collected and stored in the ground floor TSD within the Chemistry building. These residues are eventually manifested for disposal.

MANIFESTS

Attached to this inspection report are copies of the faclility's manifest since the last U.S. EPA inspection of September 2, 1987. A shipment at Paint Solvent Wastes was transported to the chemistry building on October 19, 1987. On October 7, 1987, 20 gallons of waste flammable liquids were received from the University's school at Dental Medicine in Alton, Illinois.

On October 20, 1987, and February 10, 1988, hazardous wastes shipments were made to Nuclear Sources and Services located in Houston, Texas. Also transported on those days were hazardous waste shipments made to Industrial Fuels and Resources located in South Bend, Indiana. These hazardous wastes (including F003, F005) were incinerated at that facility. In all instances, the transporter was listed as Precision Energy Systems, Inc. (ILD982208084). Only one manifest had a discrepancy noted (INA0138984). All other manifests appeared to be properly signed and dated.

LABORATORY WASTES

Upon inspecting various research and teaching labs on campus, it was apparent that many of the hazardous wastes collection bottles were stored open. This appears to be deficient in meeting the Illinois RCRA requirements Section 725.273(a) - "a container holding hazardous wastes must always be stored closed during storage, except when it is necessary to add or remove wastes".

ANNUAL TRAINING

On-site records indicate that last annual RCRA training occurred on March 31, 1987. Therefore, it appears that the facility is deficient in Illinois Rules parts 725.116 Personnel Training Requirements (Annual Training Requirements).

ANNUAL REPORTS

Subsequent to the granting of both a U.S. EPA and Illinois EPA identification number in 1987, the facility had not received (in the mail) the latest annual reporting forms. Thus, it appears that since these forms have not been received by the University, they had not been completed. Therefore, the facility appears to be deficient in Section 725.175 in that this report was not filed with the Illinois EPA by March 1, 1988.

No other deficiencies were noted at the time of this inspection. Attached to this inspection report is a completed Illinois EPA Checklist.

If you have any questions concerning this inspection report, please contact me at 886-1968.

Attachments

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION V

DATE: SEP 24 1987

SUBJECT: RCRA Inspection at Southern Illinois University - Edwardsville (ILD 006331342)(C28159)

FROM: Gerald R. Golubski, Environmental Engineer GRG
Central District Office (5SCDO)

TO: William E. Muno, Chief
RCRA Enforcement Section (5HE-12)

THRU: Willie H. Harris, Chief WHH
Central District Office (5SCDO)

On September 2, 1987, a RCRA inspection was conducted at this state facility. Representing the University was Dr. Emil Jason, Chairman, Department of Chemistry and Dr. Anthony Wilbraham, professor of chemistry. Prior to this inspection a meeting with Mr. Mike Grant of the Illinois EPA (Collinsville Office) took place. However, due to other inspectional committments, he was unable to accompany this writer to the university on this date.

Background

Although the university has had a hazardous waste program for many years, they were not awarded an U.S. EPA generator number until August, 1987. Prior to that time they considered themselves a Small Quantity Generator which recycled most of their hazardous wastes. However, the Illinois EPA considered this facility as a generator and a TSD, hence, numerous violations were cited in the past. On March 3, 1987 a meeting was held with the Illinois EPA. In that meeting the university was directed to accomplish certain RCRA regulated requirements. Namely;

1. Obtain U.S EPA indentification number for the university's Physical Plant.

2. Prepare manifest from the Physical plant to the Science Building.

3. Apply for a waste hauling permit.

4. Submit a Part A permit application for the waste storage at the Science Building.

5. Obtain detailed chemical and physical analysis of the wastes received from the physical plant.

6. Develop a written analysis plan.

7. Inspect facility for malfunctions and deteriorations.

8. Establish a hazardous wastes management training Program.

9. Make arrangements with local police, fire departments etc. in order to familiarize them with hazardous aspects of the facility.

10. Distribute copies of the contingency plan.

11. Prepare and maintain a written closure plan.

12. Prepare a written cost estimate (for closure).

13. Inspect safety equipment at facility daily and inspect treatment equipment weekly.

Subsequently to that meeting, the university has implemented or about to implement the following corrective actions.

1. Obtaining U.S. EPA ID Numbers.

   The science building was given a US. EPA ID Number (ILD 006 331 342) in August 1987. In addition, the physical plant was also given a separate U.S. EPA I.D. Number (ILD 981 949 803). The physical plant is considered a generator only. In order to transport hazardous waste across a public thoroughfare, the university was issued a transport license (#2233) for a Ford pick-up truck. (Expiration date April 30, 1988).

2. Preparing manifest from the physical plant to the science building.

   At the time of this inspection, the university has not yet prepared any such manifests from the physical plant to the science building. As explained by Dr. Wilbraham, the physical plant does not generate appreciable amounts of hazardous wastes. Typically only one or two shipments per year were ever recorded. These wastes consisted of paint laquers/thinners, typewriter cleaning solvents and some unused herbicides.

   It is anticipated that once school starts (in about two weeks) a regular pick-up (monthly) will commence. Approximately 20 gallons will be picked up each month according to Dr. Wilbraham.

   At the time of this inspection it was observed by this writer that at the paint shop area several waste paint thinner buckets were allowed to be stored open (inapparent violation of 725.273). These paint thinners consists of various volatile hydrocarbons (including ketones) which permeated the work area. It is therfore recommended (as per the directions on their supply containers) that these 5 - gallon buckets of contaminated thinners be stored closed when not in use. Furthermore, it may be prudent to construct an exhaust ventillation system along the back wall of the paint shop area in order to alleviate the apparent air emissions derived from these solvent cleaning buckets.

Also, it was noted that a single 55-gallon drum of used paint thinner was stored in the paint shop area. The drum was approximately one-third full and had an accumulation start date of February 5, 1987. As a generator of hazardous wastes the facility may be allowed to store one drum beyond 90 days (as per 722.134 (c)(1). Thus, this single drum may be in compliance at the time of this inspection.

3. Apply for a waste hauling permit.

   A Ford pick-up truck is now available to pick-up hazardous wastes from the physical plant. The words "licensed special waste hauler #2233 Exp 4-30-88" were stenciled onits sides. In addition, the truck has yellow flashing lights on its roof.

4. Submit a Part A to US. EPA.

   This was accomplished over the summer.

5. Obtain detailed chemical and physical analysis of the waste received from the physical plant.

   Dr. Jason explained that the wastes received from the physical plant are well characterized from their labeled purchase containers (paint lacquers, thinners, used paints, degreasing solvents). Moreover, it was further explained that the university also keeps material safety data sheets on these wastes. Finally, the chemistry department will perform routine D & F classification tests on these wastes. Apparently, at the present time this program seems sufficient.

6. Develop a written analysis plan.

   This plan was submitted to the Illinois EPA and was approved this summer according to Mr. Mike Grant (Illinois EPA - Collinville Office). A copy of this plan was made available during the time of this inspection, No deficiencies were noted.

7. Inspect facility for malfunctions and deteriorations.

   This plan was presented at the time of the inspection. Inspections are conducted by Mr. Rajagopal Ganapathy, Charles Wartehow or Brad Hart. These persons attended a RCRA training class on March 31, 1987, as documented in the files at the university.

8. Establish a Hazardous waste training program.

   It is expected that (besides Drs. Jason and Wilbraham) a cadre of undergraduate

and graduate students will be involved in the RCRA program beginning this fall. Therefore, it is imperative that any future RCRA inspections review the documentation that all persons were adequately trained. At the time of this inspection only the three students, as detailed in item #7, were documented as receiving training. Again, it must be noted that the school was essentially vacated at the time of the inspection. Thus, it was not possible to interview any students who may be involved in the hazardous wastes program this fall.

9. Make arrangements with local police and fire departments.

   This was completed this summer and a list of the agencies contacted were on file.

10. Distribute copies of the contingency plan.

    This was accomplished this summer.

11. Prepare a written closure plan.

    This was completed this summer, however, the closure plan was written in terms of the Federal Regulatory Rules (40 CFR's) rather than under the State regulations.

    Also, the university operating guidebooks (general requirements, manifests systems, preparedness and prevention, etc.) all reference the the federal requirements rather than the state's. It is, therfore, recommended that these changes be implemented.

12. Prepare a written cost estimate (for closure).

    This was done this summer. Moreover, it was suggested by this writer that the cost estimate should be revised yearly or whenever a significant change in the hazardous wastes program may develop.

13. Inspect safety equipment at the facility.

    This is documented in the inspection logs.

Recycling Activities

The university has for many years kept a detailed log of the wastes that have been recovered (by distillation) or rendered harmless (by neutralization and/or precipitation). These records were made available at the time of the inspection. They appeared to be complete.

Once school begins it is expected that the teaching labs will be generating approximately 60 gallons a month of spent solvents and the research labs will be generating approximately twenty gallons monthly. Lab wastes in containers will be reused whenever possible according to Dr. Wilbraham. However, if they can no longer be used (their purity can no longer be assured) they will be disposed of in lab packs.

Manifests

In 1987 only two off-site manifests were prepared. Four drums of D001 - Wastes Flammable liquids were sent to Industrial Fuels and Resources for disposal. Both manifests had the required signatures. No discrepancies were noted.

In 1986 140 gallons of wastes were generated at the university due to teaching activities and 275 gallons of wastes solvents were generated at the physical plant. These wastes were either recycled or sent out in the 1987 manifests.

In 1985 576 Kilograms of wastes were generated. Again, only two shipments were made off-site.

Solvent Storage Room 0308

All hazardous wastes are stored in a separate storage room in the science building. The outside door has signs "no smoking" "caution". In addition a pull chain shower/eye wash is situated at the entrance of this storage vault. The storage area has a six inch spill prevention dike. No underdrains were apparent in the storage area. All lighting is enclosed within explosion resistant receptacles. Wastes are separated by type (flammable, explosives, acids, alkalies, etc.). No deficiencies were noted at the time of this inspection.

Summary

At the time of this inspection it appears that the facility may be deficient in RCRA requirements 725.273, open storing of containers.

Attached to this transmittal is a completed Illinois EPA - RCRA Inspection Report.

If you have any questions concerning this report please, contact me at 886-1968.

→ Ron Brown
WEM
9-11-87

Illinois Environmental Protection Agency · P.O. Box 19276, Springfield, IL 62794-9276

217/782-5544

September 4, 1987

Mr. Basil G. Constantelos, Director
Waste Management Division
U.S. Environmental Protection Agency
Region V
320 South Dearborn Street
Chicago, Illinois 60604

Re: Request for Issuance of Administrative Order
LPC 1190255002 - Madison County
Edwardsville/Southern Illinois University at
Edwardsville-Science Building
ILD 006331342
Enforcement File - IEPA File No. 8267-HAZ

Dear Mr. Constantelos:

The Illinois Environmental Protection Agency (IEPA) hereby requests that an administrative order be issued concerning the above-referenced facility for noncompliance with RCRA permit program requirements applicable to hazardous waste management facilities under Title 35 of the Illinois Administrative Code, Part 703. In particular, noncompliance with 35 Ill. Adm. Code 703.152(a)(2) is cited for failure to make a timely submission of Part A of the RCRA permit application. However, due to circumstances under which there was initial confusion over whether a separate Part A was required for storage activities at the Science Building and due to the University's prompt action and cooperation in resolving all other matters of noncompliance with interim status standards, IEPA requests issuance of an order so as to grant interim status coverage to facility operations without inclusion of a proposed civil penalty.

The facilities at Southern Illinois University - Edwardsville received their original RCRA inspection on July 1, 1986 as a result of a request from a University graduate student. Subsequent to the inspection, the University's Chemistry Department has been coordinating hazardous waste management activities on campus and has been actively establishing a RCRA program. The University has classified their waste streams and is collecting them. It was also determined that the campus has two separate regulated facilities.

The Physical Plant is a small quantity generator of spent solvent. The Science Building is a small quantity generator and includes storage and treatment units. Consequently, filing of a Part A was required for the Science Building and filing of separate notifications was required for each of the two facilities.

The Notification of Hazardous Waste Activity form for the Science Building was submitted on January 7, 1987. Part A of the RCRA permit application was submitted on March 23, 1987.

Concerning treatment at the Science Building, the Part A was submitted in a timely manner so as to meet the March 24, 1987 deadline of 35 Ill. Adm. Code 703.150(a)(3) to qualify for interim status. However, the Science Building also includes a storage unit which receives approximately one 55 gallon drum per month of spent solvent from the Physical Plant for distillation. Pursuant to 35 Ill. Adm. Code 721.106(c)(1), waste which is stored prior to recycling is regulated. The exemption provided in 35 Ill. Adm. Code 722.134(a) for small quantity generators would not apply, since the waste storage occurs for more than 90 days.

When it was determined that the Physical Plant was considered an off-site facility, the University obtained a special waste hauling permit and began manifesting shipments going to the Science Building. While 35 Ill. Adm. Code 703.150(a)(2) required that the Part A for storage be filed within 30 days after acceptance of the first drum of waste, it was not determined by IEPA that the Physical Plant was an off-site facility until well after this 30 day period had expired.

Please provide a copy of this letter and the enclosed supporting documentation to the appropriate USEPA staff member assigned to this matter. If your staff should have any technical questions after reviewing these documents, Michael Grant of our Field Operations Section may be contacted directly at 618/345-4606.

Please see that Bruce Carlson of IEPA's legal staff is promptly informed of the USEPA personnel assigned to this matter and that he is copied on all orders or other communications directed to the subject facility. If USEPA should decide that it cannot proceed in this matter, please promply return these documents to me along with a written statement of your reasons.

Thank you for your assistance.

Sincerely yours,

Gary P. King

Gary P. King
Senior Attorney
Enforcement Programs
Division of Land Pollution Control

GK:tdd

Enclosures

cc: Bruce Carlson
Joseph E. Svoboda
Bur Filson
FOS/DLPC, Collinsville Regional Office
Division File/DLPC
Docket Control

LIST OF DOCUMENTS

Illinois Environmental Protection Agency · 2200 Churchill Road, Springfield, IL 62706

217/782-6761

Refer to: 1195025002 -- Madison County
SIU - Edwardsville, Science Building
USEPA & Applied For
Compliance File

PRE-ENFORCEMENT CONFERENCE LETTER

Certified #P594 556 943

February 19, 1987

Southern Illinois University
at Edwardsville
Attention: Earl E. Lazerson, President
P.O. Box 1151
Edwardsville, Illinois 62026

Dear Mr. Lazerson:

By copy of this letter the Agency hereby informs SIU - Edwardsville, Science Building of apparent violations of the Illinois Environmental Protection Act and/or rules and regulations accepted thereunder. These apparent violations are set forth in Attachment A of this letter.

As a result of these apparent violations, it is our intent to refer this matter to the Agency's legal staff for the preparation of a formal enforcement case. The Agency's legal staff will, in turn, refer this matter to the Office of Attorney General or to the United States Environmental Protection Agency for the filing of a formal complaint.

Prior to taking such action, however, you are requested to attend a Pre-Enforcement Conference to be held at the Illinois Environmental Protection Agency, Collinsville Regional Office, 2009 Hall Street, Collinsville, Illinois 62234. The purpose of this Conference will be:

1. To discuss the validity of the apparent violations noted by Agency staff, and

2. To arrive at a program to eliminate existing and/or future violations.

You should, therefore, bring such personnel and records to the conference as will enable a complete discussion of the above items. We have scheduled the Conference for March 3, 1987, at 10:30 a.m. If this arrangement is inconvenient, please contact Mike Grant or Pat McCarthy at 618/345-4606 to arrange for an alternative date and time.

In addition, please be advised that this letter constitutes the notice required by Section 31(a) of the Illinois Environmental Protection Act prior to the filing of a formal complaint. The cited Section of the Illinois Environmental Protection Act requires the Agency to inform you of the charges which are to be alleged and offer you the opportunity to meet with appropriate officials within thirty days of this notice date in an effort to resolve such conflict which could lead to the filing of formal action.

Sincerely,

Harry A. Chappel, P.E., Manager
Compliance Monitoring Section
Division of Land Pollution Control

HAC:BF:sf/1560g,16-16

Attachment

cc: Division File
Southern Region
Bruce Carlson
Mike Grant
Dan Filson

Attachment A

1. Pursuant to 35 Ill. Adm. Code 703.121(a), no person shall conduct any hazardous waste storage, hazardous waste treatment or hazardous waste disposal operation:

   1. Without a RCRA permit for the HWM (hazardous waste management) facility; or

   2. In violation of any condition imposed by a RCRA permit.

   You are in apparent violation of 35 Ill. Adm. Code 703.121(a) for the following reason: Failure to file Part A of the permit application.

2. Pursuant to 35 Ill. Adm. Code 703.150(a), the owner or operator of an existing HWM facility must submit Part A of the permit application to the Agency no later than the following times, whichever comes first:

   1. Six months after the date of publication of regulations which first require the owner or operator to comply with standards in 35 Ill. Adm. Code 725.

   2. Thirty days after the date the owner or operator first becomes subject to the standards in 35 Ill. Adm. Code 725.

   You are in apparent violation of 35 Ill. Adm. Code 703.150(a) for the following reason: Failure to submit Part A of the permit application for the waste storage activities.

3. Pursuant to 35 Ill. Adm. Code 725.113(a), the owner or operator is required to conduct a detailed chemical and physical analysis of a representative sample of hazardous waste prior to storage. You are in apparent violation of 35 Ill. Adm. Code 725.113(a) for the following reason: Failure to obtain a detailed chemical and physical analysis of the waste received from the Physical Plant.

4. Pursuant to 35 Ill. Adm. Code 725.113(b), the owner or operator must develop and follow a written waste analysis plan which describes the procedures which he will carry out to comply with paragraph (a). He must keep this plan at the facility. At a minimum, the plan must specify:

   1. The parameters for which each hazardous waste will be analyzed and the rationale for the selection of these parameters (i.e., how analysis for these parameters will provide sufficient information on the waste's properties to comply with paragraph (a).

   2. The test methods which will be used to test for these parameters;

   3. The sampling method which will be used to obtain a representative sample of the waste to be analyzed. A representative sample may be obtained using either:

      A. One of the sampling methods described in 35 Ill. Adm. Code 721 Appendix A or

B. An equivalent sampling method.
(Board Note: See 35 Ill. Adm. Code 720.120(c) for related discussion.)

4. The frequency with which the initial analysis of the waste will be reviewed or repeated to ensure that the analysis is accurate and up-to-date;

5. For off-site facilities, the waste analyses that hazardous waste generators have agreed to supply; and

6. Where applicable, the methods which will be used to meet the additional waste analysis requirements for specific waste management methods as specified in Section 725.293, 725.325, 725.352, 725.373, 725.414, 725.445, 725.475 and 725.502.

You are in apparent violation of 35 Ill. Adm. Code for the following reason: Failure to develop a written analysis plan.

5. Pursuant to 35 Ill. Adm. Code 725.115(a), the owner or operator must inspect his facility for malfunctions and deterioration, operator errors and discharges that may be causing or may lead to a release to the environment or a threat to human health. You are in apparent violation of 35 Ill. Adm. Code 725.115(a) in that the required inspections are not being made.

6. Pursuant to 35 Ill. Adm. Code 725.116(a), facility personnel must complete a program of classroom instruction or on-the-job training directed by a person trained in hazardous waste management procedures. The training must be designed to ensure that facility personnel are able to respond to emergencies, and at a minimum meet the applicable requirements of Section 725.116(a)(3). You are in apparent violation of 35 Ill. Adm. Code 725.116(a) for the following reason: Failure to establish and implement a hazardous waste management training program.

7. Pursuant to 35 Ill. Adm. Code 725.137, the owner or operator must attempt to make arrangements to familiarize local police, fire departments, emergency response teams and hospitals as well as state authorities with the hazardous aspects of the facility. These arrangements are to be included in the contingency plan. You are in apparent violation of 35 Ill. Adm. Code 725.137 for the following reason: Failure to make the appropriate arrangements.

8. Pursuant to 35 Ill. Adm. Code 725.153, a copy of the contingency plan and all revisions to the plan must be:

a) Maintained at the facility; and

b) Submitted to all local police departments, fire departments, hospitals and state and local emergency response teams that may be called upon to provide emergency services.

You are in apparent violation of 35 Ill. Adm. Code 725.153 in that condition b above was not complied with.

9. Pursuant to 35 Ill. Adm. Code 725.173, the owner or operator must keep a written operating record at the facility. The operating record must include the following:

   1. A description and the quantity of each hazardous waste received and the method(s) and date(s) of its treatment, storage or disposal at the facility as required by Appendix I of 35 Ill. Adm. Code 725.173;

   2. The location and quantity of each hazardous waste within the facility including cross-references to specific manifest document numbers;

   3. Records and results of waste analyses and trial tests;

   4. Summary reports and details of all incidents that require implementation of the contingency plan;

   5. Records and results of inspections;

   6. Monitoring, testing and other analytical data;

   7. All closure cost estimates and, for disposal facilities, all post-closure cost estimates.

   You are in apparent violation of 35 Ill. Adm. Code 725.173 for the following reason: Failure to include the waste received from the Physical Plant in the operating record.

10. Pursuant to 35 Ill. Adm. Code 725.176, if a facility accepts for treatment storage or disposal any hazardous waste from an off-site source without an accompanying manifest or without an accompanying shipping paper as described in 35 Ill. Adm. Code 723.120(3)(2) and if the waste is not excluded from the manifest requirement by 35 Ill. Adm. Code 721.105 then the owner or operator must prepare and submit a single copy of a report to the Director within 15 days after receiving the waste. The unmanifested waste report must be submitted on EPA form 8700-13B. Such report must be designated "Unmanifested Waste Report" and include the following information:

    a) The USEPA identification number, name and address of the facility;

    b) The date the facility received the waste;

    c) The USEPA identification number, name and address of the generator and the transporter, if available;

    d) A description and the quantity of each unmanifested hazardous waste the facility received;

    e) The method of treatment, storage or disposal for each hazardous waste;

    f) The certification signed by the owner or operator of the facility or his authorized representative: and

g) A brief explanation of why the waste was unmanifested, if known.

You are in apparent violation of 35 Ill. Adm. Code 725.176 for the following reason: Failure to file the above report for the waste received from the Physical Plant without an accompanying manifest.

11. Pursuant to 35 Ill. Adm. Code 725.212(a), by May 19, 1981, the owner or operator must have a written closure plan. A copy of the closure plan and all revisions must be kept at the facility until closure is completed and certified. The closure plan must include at least:

    1. A description of how and when the facility will be partially closed, if applicable, and finally closed. The plan must identify how the requirements of Sections 725.211, 725.213, 725.214 and 725.215 and applicable requirements of 725.297, 725.328, 725.380, 725.410, 725.451, 725.481 and 725.504 will be met;

    2. An estimate of the maximum inventory of wastes in storage and in treatment at any time during the life of the facility;

    3. A description of the steps needed to decontaminate facility equipment and surrounding soil if necessary;

    4. An estimate of the expected year of closure and a schedule for final closure;

    5. A provision for closure certification by an independent registered professional engineer.

    You are in apparent violation of 35 Ill. Adm. Code 725.212(a) for the following reason: Failure to prepare and maintain a written closure plan.

12. Pursuant to 35 Ill. Adm. Code 725.242(a), the owner or operator must prepare a written estimate, in current dollars, of the cost of closing the facility in accordance with the closure plan as specified in Section 725.212. The closure cost estimate must equal the cost of closure at the point in the facility's operating life when the extent and manner of its operation would make closure the most expensive, as indicated by its closure plan. You are in apparent violation of 35 Ill. Adm. Code 725.242(a) for the following reason: Failure to prepare a written closure cost estimate.

13. Pursuant to 35 Ill. Adm. Code 725.274, the owner or operator must inspect areas where containers are stored at least weekly, looking for leaks and for deterioration caused by corrosion or other factors. You are in apparent violation of 35 Ill. Adm. Code 725.274 for the following reason: Failure to conduct the required inspections.

14. Pursuant to 35 Ill. Adm. Code 725.503, the owner or operator of a treatment facility must inspect, where present.

    a. Discharge control and safety equipment (e.g., waste feed cutoff systems, bypass systems, drainage systems and pressure relief systems) at least once each operating day to ensure that it is in good working order;

    b. Data gathered from monitoring equipment (e.g., pressure and temperature gauges) at least once each operating day to ensure that the treatment process or equipment is being operated according to its design;

    c. The construction materials of the treatment process or equipment at least weekly to detect corrosion or leaking of fixtures or seams; and

    d. The construction materials of, and the area immediately surrounding, discharge confinement structures (e.g., dikes) at least weekly to detect erosion or obvious signs of leakage (e.g., wet spots or dead vegetation).

    Comment: As required by Section 725.115(c), the owner or operator must remedy any deterioration or malfunction he finds.

    You are in apparent violation of 35 Ill. Adm. Code 725.503 in that items a and c above were not being conducted.

MDG:jlr/0050L

SIUE Southern Illinois University at Edwardsville

Office of the Vice President and Provost

March 17, 1987

Mr. Bruce L. Carlson
Enforcement Programs
Division of Land Pollution Control
2200 Churchill Road
Springfield, IL 62702

Dear Mr. Carlson:

This communication summarizes the actions the University was directed to take as a result of the March 3, 1987 meeting with you and other EPA representatives and provides our responses as you requested.

1. Prepare application for a USEPA identification number for our Physical Plant. This has been completed and forwarded.

2. Prepare a manifest to accompany each load of solvent waste shipped from the Physical Plant to the Science Building. This will be done starting with the next load.

3. Apply for waste hauling permit. This has been done.

4. Submit Part A of the permit application for the waste storage activities by March 24.

5. Obtain a detailed chemical and physical analysis of the waste received from the Physical Plant. In carrying out this activity we will analyze for D & F classifications, test for certain metals and employ MSDS sheets.

6. Develop a written analysis plan. This plan is contained in our Procedures Handbook which is currently in draft form.

7. Inspect facility for malfunctions and deteriorations. A regular inspection will commence March 25 employing a weekly drum inspection log.

8. Establish and implement a hazardous waste management training program by March 30. The training program will be presented.

9. Make appropriate arrangements with local police, fire departments, etc. to familiarize them with hazardous aspects of the facility. An appropriate letter has been prepared and will be sent with our Contingency Plan by March 24.

10. Forward a copy of the Contingency Plan to appropriate local officials. This will be done by March 24.

Rendleman Building, Edwardsville, Illinois 62026-1021 (618) 692-3772

11. Include the waste received from the Physical Plant in the operating record. This directive has been put into place as of March 3 and an operating record log covering that waste is being employed.

12. Prepare and maintain a written closure plan by the second week in April, 1987. This will be accomplished.

13. Prepare a written closure cost estimate by the second week in April, 1987. This will be accomplished.

14. Inspect safety equipment of facility daily and treatment equipment weekly. An inspection log will be prepared and employed by March 30.

If you desire further information, please let me know.

Sincerely,

Earl S. Beard
Vice President for Administration

cc: Mr. Mike Grant
Dr. Emil Jason
Mr. P. M. McCarthy
President Earl Lazerson

Illinois Environmental Protection Agency · 2200 Churchill Road, Springfield, IL 62706

217/782-6761

Refer to: 1192255002 -- Madison County
SIU-Edwardsville, Science Building
ILD981801491
Compliance

May 12, 1987

Southern Illinois University at Edwardsville
Attention: Mr. Earl E. Lazerson, President
P.O. Box 1151
Edwardsville, Illinois 62026

Dear Mr. Lazerson:

On April 17, 1987 a visit to your facility was conducted to determine the compliance status with respsect to the apparent violations identified in our February 19, 1987 Pre-Enforcement Conference Letter. At that time, records were reviewed which resolved the apparent violation of the following Sections: 703.121(a), 725.113(a), 726.115(a), 725.116(a), 725.137, 725.153, 725.173, 725.274 and 725.602.

If you have any questions, please contact Mike Grant at 618/345-4606.

Sincerely,

Barry A. Chappel, P.E., Acting Manager
Facilities Compliance Unit
Compliance Monitoring Section
Division of Land Pollution Control

MAC:BF:ba/2510g/29

cc: Division File
Southern Region
Bruce Carlson
Mike Grant
Cur Filson

RECEIVED
ENFORCEMENT PROGRAMS
MAY 14 1987
Environmental Protection Agency

SIUE Southern Illinois University at Edwardsville

School of Sciences
Department of Chemistry

May 27, 1987

Mike Grant
Environmental Protection Agency
2009 Mall Street
Collinsville, IL 62234

Dear Mike:

Enclosed are the "Unmanifested Waste Report" and other pertinent materials which you requested.

The other material which you requested is being prepared and will be sent to you soon.

Sincerely,

Emil Jason

Emil Jason

ls

Rm. 2327, Science Building, Edwardsville, Illinois 62026-1001 (618) 692-2042

SIUE Southern Illinois University at Edwardsville

School of Sciences
Department of Chemistry

May 26, 1987

Director
Illinois EPA
2200 Churchill Road
Springfield, IL 62702

Dear Sir:

In accordance with 35 Ill. Adm. Code 725.176, I have attached an "Unmanifested Waste Report."

Sincerely,

Emil F. Jason
Acting Coordinator
Waste Management Program

EFJ:ls

cc: Earl S. Beard
Vice President for Administration

✓ Mike Grant
P.M. McCarthy

Rm. 2327, Science Building, Edwardsville, Illinois 62026-1001 (618) 692-2042

Unmanifested Waste Report
Section 725.176

(a) The USEPA identification number, name and address of the facility that received unmanifested waste are:

USEPA number: ILD 006331342

Southern Illinois University - Science Building
Route 157
Edwardsville, IL 62026

(b) The date the facility received the waste was about November 10, 1986.

(c) The USEPA identification number, name and address of the generator and transporter were:

Generator:

USEPA number: ILD 981949803

Southern Illinois University - Physical Plant
Route 157
Edwardsville, IL 62026

Transporter:

Transporter number: 2233

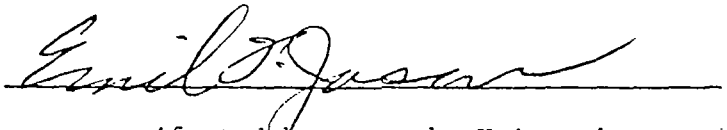
Southern Illinois University - Edwardsville
Route 157
Edwardsville, IL 62026

(d) The waste treatment facility received about 50 gallons of spent organic solvents characterized as D001.

(e) The treatment facility received the solvents via distillation at atmospheric pressure leaving a dark-colored residue. The residue, about two gallons, was stored in our accumulation area.

(f) The certified signature of the facility's authorized representative is:

Emil F. Jason



(g) The waste area was unmanifested because the University was recently split into two areas.

CLOSURE PLAN

for the

Southern Illinois University - Edwardsville

Waste Management Program

Science Laboratory (SL) Building
Room SL 1209
SIU-E
Edwardsville, IL 62026

operated by

Waste Management Program

In accordance with 35 Ill. Adm. Code Subpart G:
Closure and Post-Closure

Closure Plan

Applicability. (725.210)

The Waste Management Program at SIU-E controls and regulates the chemical wastes generated by the various science laboratories and other campus departments. This waste is composed of relatively small quantities of chemically diverse substances, which are collected in primarily one gallon containers. These containers are then brought to the Hazardous Waste Laboratory where their contents are subjected to a wide variety of treatment methods. Waste treatment residue and those wastes which cannot be treated at the Hazardous Waste Laboratory are kept temporarily in a designated room (Solvent Room) located in the basement of the SL Building. The Waste Management Program does not use ground impoundments or storage tanks; thus groundwater contamination is not a concern.

The regulations in this subpart apply to SIU-E, since it is an owner and operator of a hazardous waste facility. The specific regulations which apply to SIU-E are secs. 725.210 - 725.215.

Closure Performance Standard. (725.211)

This closure plan is designed to minimize the need for further maintenance after the facility is closed; and to eliminate, control, or minimize post-closure escape of hazardous waste; hazardous waste constituents, leachate, contaminated rainfall or waste decomposition products to the ground or surface waters or atmosphere, to the extent necessary to protect human health and the environment.

Closure Plan; Amendment of Plan. (725.212)

By May 19, 1981, the owner or operator must have a written closure plan and must retain a copy of said plan and its revisions at the facility until closure is completed and certified in accordance with sec. 725.215. This plan must identify the steps necessary to completely or partially close the facility at any point during its intended operating life.

Steps to Closure

1. Determine when closure is desirable.
2. Notify the Federal EPA and Illinois EPA 180 days prior to closure.
3. Notify campus departmetns of the last day waste will be accepted.
4. Determine supplies to be ordered: Containers, lab-packing materials, etc.
5. When sufficient supplies are on hand, begin packing waste.
6. Dispose of all reactives and explosives.
7. Finish all treatments: neutralization, distillation, etc.
8. Locate off-campus disposal facilities and acquire necessary permits.
9. Decontaminate Hazardous Waste Laboratory and Solvent Room and equipment.
10. When all waste is packaged, submit manifests to off-campus disposal facilities.
11. When manifests are approved, ship waste.
12. Perform final inspection on facility.
13. Hire an appropriate professional to certify proper closure.
14. Submit certificate of closure to the Federal EPA and Illinois EPA.
15. After EPA inspection, if seen fit, rectify any problems and repeat steps 14-16.
16. File last annual report.

Estimated Amount of Waste Streams Generated

Waste Stream Source	Estimated Amount gal./month	Characteristics of Waste Stream
Paint Shop	50	D001
Fast Copy	1	D001, D000
Print Shop	5-10	D001, D000
Office Machine Repair	10	D001, D000
Auto Shop	20	D001
Heating & Refrigeration	20	D001, D000
Grounds	15	D001, D000
Dental School	15	D000, D001, D002 D003
Chemistry, Teaching Labs	64	D000, D001, D002 D003
Chemistry·Research Labs	20	D000, D001, D002 D003
Biology, Teaching Labs	2	D000, D001, D002 D003
Biology, Research Labs	3	D000, D001, D002 D003
Audio Visual, Color	2	D000, D001
Audio Visual, Black & White	3	D000, D001
Photographic Service, B & W	5	D001, D001, D002
Arts, Black & White	10	D000, D001, D002
Education, Black & White	4	D000, D001, D002
Alestle, Black & White	1	D000, D001, D002
Journalism, Black & White	2	D000, D001, D002
Physics, Black & White	0.5	D000, D001, D002
Wagner, Black & White	8	D000, D001, D002
Art Department	5	D000, D001, D002
Craft Shop	1	D000, D001, D002
East St. Louis Campus	5-10	D000, D001, D002
Scene Shop	2-5	D000, D001, D002
School of Engineering	5	D000, D001

Total Amount generated: 278-291 gal./month.

The Waste Water Treatment facility generates approximately one ton of sludge/month. This sludge contains no significant amounts of D000 contaminants.

It is estimated that the maximum inventory of waste in temporary storage and in treatment at any time during the life of the facility will not exceed 500 gallons.

When closure is completed, we will submmit to the Regional Administrator certification by both the owner and by an independent registered professional engineer that the facility has been closed in accordance with the specifications in our approved closure plan.

Should it be necessary to contact someone about the Waste Management Program during the post-closure period, contact the Director, Waste Management Program.

SL Building Room 2306
SIU-E
Edwardsville, IL 62026
(618) 692-2042

Certificate of Closure

FOR: Southern Illinois University at Edwardsville's Waste Management Facility. Location of which is in the Science Building, Rm. 1209, Edwardsville, Illinois.

NOTE: The University's primary storage building is still in full use.

INSPECTION:

1. All chemical containers have been removed. ___Yes ___No
2. Floors are cleaned and free from chemical residues. ___Yes ___No
3. Walls are cleaned and free from chemical residues. ___Yes ___No
4. Tub and basins are cleaned and free from chemical residues. ___Yes ___No
5. All equipment and tools have been removed to a primary facility. ___Yes ___No
6. Surrounding grounds are free from contaminated debris. ___Yes ___No
7. All floura and fauna appear healthy. ___Yes ___No

COMMENTS: _____

_____

_____

_____

I have inspected the above mentioned facility and have determined it to be clean and contamination free.

_____ _____
Typed Name #P.E.

_____ _____
Signature/Professional Engineer Date

I have inspected the above mentioned facility and have determined the following need attention prior to closure.

_____

_____

_____

_____(Signature/Professional Engineer) (Date)

Cost Estimate for Facility Closure

5/4/87

265.142 (724.242) Financial Requirements: Cost Estimate for Closure

Barrels Needed

Packing Style	Volume (gallons)	Average Volume in Drum (gallons)	Number of Drums
Bulk Solvent	450	50	9
Lab pack	15	15	1
Total	465		10

Cost for Drums

Number Drums	Cost/Drum	Total Cost
10	35	350

Vermiculate Needed

Packing Style	Bags/Drum	Bags Needed
Lab pack	1.5	1.5

Vermiculate Cost

Number Bags	Cost/Bag	Cost of Transport	Total Cost
1.5	4.78	0	7.17

Disposal Cost

Number Drums	Disposal Cost
1	600
9	3150
Total 10	3750

Summary

Drums	$350
Vermiculate	7
Disposal	3750
Cost of closure	4107
Safety Margin	1500
Total Cost of closure	$5607

Enf.

Illinois Environmental Protection Agency · 2200 Churchill Road, Springfield, IL 62706

217/782-6761

Refer to: 1190255002 -- Madison County
SIU - Edwardsville, Science Building
ILD006357342
Compliance File

June 12, 1987

Southern Illinois University at Edwardsville
Attention: Mr. Earl E. Lazerson, President
P.O. Box 1151
Edwardsville, Illinois 62026

Dear Mr. Lazerson:

The Agency is in receipt of your May 27, 1987 response(s) to our March 3, 1987 Pre-Enforcement Conference. Your response(s) has been reviewed and the apparent violation(s) of Section(s) 725.176, 725.212 and 725.242 are now considered resolved.

If you have any questions, please contact Mike Grant at 618/346-4606.

Sincerely,

Harry A. Chappel, P.E., Acting Manager
Facilities Compliance Unit
Compliance Monitoring Section
Division of Land Pollution Control

HAC:BF:ba/2762g/48

cc: Division File
Southern Region
Bruce Carlson
Mike Grant
Bar Filson

Ent

Illinois Environmental Protection Agency 2200 Churchill Road, Springfield, IL 62706

217/782-6761

Refer to: 1190255002 -- Madison County
SIU - Edwardsville, Science Building
ILD006331342
Compliance File

August 6, 1987

Southern Illinois University of Edwardsville
Attn: Mr. Earl E. Lazerson, President
P.O. Box 1151
Edwardsville, IL 62026

Dear Mr. Lazerson:

The Agency is in receipt of your July 24, 1987 response(s) to our March 3, 1987 Pre-Enforcement Conference. Your response(s) has been reviewed and the apparent violation(s) of Section(s) 725.113 is now considered resolved.

If you have any questions, please contact Mike Grant at 618/345-4606.

Sincerely,

Linda J. Kissinger

Linda J. Kissinger, Manager
Technical Compliance Unit
Compliance Section
Division of Land Pollution Control

LJK:BF:st:3255g,34

cc: Division File
Southern Region
Bruce Carlson
Mike Grant
Bur Filson

RCRA INSPECTION REPORT - INTERIM STATUS STANDARDS
TREATMENT, STORAGE, AND DISPOSAL FACILITIES
Form A General Facility Standards

I. General Information

USEPA Number: NON-NOTIFIER IEPA Number: 1190255002

Major Facility: YES/NO Notified As: NON-NOTIFIER Regulated As: 6/S

(A) Facility Name: Southern Illinois University - Edwardsville

(B) Street: Edwardsville Campus

(C) City: Edwardsville (D) State: Illinois (E) Zip Code: 62026

(F) Phone: (G) County: Madison

(H) Operator: SAME AS ABOVE

(I) Street:

(J) City: (K) State: (L) Zip Code:

(M) Phone: (N) County:

(O) Owner: SAME AS ABOVE

(P) Street:

(Q) City: (R) State: (S) Zip Code:

(T) Phone: (U) County:

Region: 5 (V) Date of Inspection: 07/01/86 (W) Time: (From) 10:00 (To) 12:30

Type of Inspection: (ISS) RECORD REVIEW SAMPLING CITIZEN COMPLAINT
CLOSED WITHDRAWAL OTHER PART B
F/U ___/___/___ (Date of Initial Inspection)

(X) Weather Conditions: Overcast, 80°

Area	Section	Class I	Class II
OTH	722.111	1	
TOTAL Class I's & II's		1	0

(AA) Preparer Information

Name
Michael D. Grant

Agency/Title
IEPA/EPS

Telephone
618/345-4606

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IL 532-1343
IPC 10h 4/85 Pg. 1

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(Y) Person(s) Interviewed	Title	Telephone
Dr. Emil Jason	Chairman - Chem. Dept.	618/692-2042
Dick Reif	Ed Asst. Haz Waste Mgmt	618/692-2042
Mike Guerra	Safety Coordinator	

(Z) Inspection Participants	Agency/Title	Telephone
Brent Harris	IEPA/LSCT	618/345-4606
Mike Grant	IEPA/EPS	618/345-4606

II. Section A: Scope of Inspection.

1. Interim Status standards for the treatment, storage or disposal of HAZARDOUS WASTES SUBJECT TO 35 Ill. Adm. Code 725.101. Complete Inspection Form A, Sections B, C, D, E, and G.

2. Place an "X" in the box(es) corresponding to the facility's treatment, storage or disposal processes, and generation and/or transportation activity (if any). Complete only the applicable sections and appendixes.

Permit application process(es) (EPA Form 3510-3)			Inspection Form A section(s)
S01	☒	storage in containers	I
S02	☐	storage in tanks	J
T01	☐	treatment in tanks	J
S04	☐	storage in surface impoundment	K, F
T02	☐	treatment in surface impoundment	K, F
D83	☐	disposal in surface impoundment	K, F
S03	☐	storage in waste pile	L
D81	☐	disposal by land application	M, F
D80	☐	disposal in landfill	N, F
T03	☐	treatment by incineration	O, P
T04	☐	treatment in devices other than tanks, surface impoundments, or incinerators	Q

Other Activities

GENERATOR	☒	APPENDIX	GN
TRANSPORTER	☐	APPENDIX	TR

3. Indicate any hazardous waste processes, by process code, which have been omitted from Part A of the facility's permit application.

4. Indicate any hazardous waste processes (by process code and line number on EPA Form 3510-3 page 1 of 5) which appear to be eligible for exclusion per 35 Ill. Adm. Code 725.101(c). Provide a brief rationale for the possible exclusion.

III. GENERAL FACILITY STANDARDS:
(Part 265 Subpart B)

	Yes	No	NI*	Remark
(A) Has the Regional Administrator been notified regarding:				
1. Receipt of hazardous waste from a foreign source?		N/A		
2. Facility expansion?		N/A		
(B) General Waste Analysis:				
1. Has the owner or operator obtained a detailed chemical and physical analysis of the waste?		✓		
2. Does the owner or operator have a detailed waste analysis plan on file at the facility?		✓		
3. Does the waste analysis plan specify procedures for inspection and analysis of each movement of hazardous waste from off-site?		N/A		No off-site waste accepted.
(C) Security - Do security measures include: (if applicable)				
1. 24-Hour surveillance?	✓			Campus Police
2. Artificial or natural barrier around facility?		✓		
3. Controlled entry?	✓			
4. Danger sign(s) at entrance?		✓		
(D) Do Owner or Operator Inspections Include:				
1. Records of malfunctions?		✓		
2. Records of operator error?		✓		
3. Records of discharges?		✓		

*Not Inspected

	Yes	No	NI*	Remarks
4. Inspection schedule?	---	✓	---	
5. Safety, emergency equipment?	---	✓	---	
6. Security devices?	---	✓	---	
7. Operating and structural devices?	---	✓	---	
8. Inspection log?	---	✓	---	
(E) Do personnel training records include: (Effective 5/19/81)				
1. Job titles?	---	✓	---	A hazardous waste training program has not been implemented.
2. Job descriptions?	---	✓	---	
3. Description of training?	---	✓	---	
4. Records of training?	---	✓	---	
5. Have facility personnel received required training by 5-19-81?	---	✓	---	
6. Do new personnel receive required training within six months?	---	✓	---	
(F) If required are the following special requirements for ignitable, reactive, or incompatible wastes addressed?				
1. Special handling?	---	INDETERMINATE	---	Handling methods differ for various Departments
2. No smoking signs?	---	"	---	
3. Separation and protection from ignition sources?	---	"	---	

*Not Inspected

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IV. PREPAREDNESS AND PREVENTION:
(Part 265 Subpart C)

	Yes	No	NI*	Remarks
(A) Maintenance and Operation of Facility:				
Is there any evidence of fire, explosion, or release of hazardous waste or hazardous waste constituent?		✓		
(B) If required, does the facility have the following equipment:				
1. Internal communications or alarm systems?			Indeterminate	
2. Telephone or 2-way radios at the scene of operations?			Indeterminate	
3. Portable fire extinguishers, fire control, spill control equipment and decontamination equipment?			Indeterminate	Fire Ext. on-site however locations and amounts could not be verified.

Indicate the volume of water and/or foam available for fire control:

	Yes	No	NI*	Remarks
(C) Testing and Maintenance of Emergency Equipment:				
1. Has the owner or operator established testing and maintenance procedures for emergency equipment?	✓			Fire Ext. inspected by safety coordinator.
2. Is emergency equipment maintained in operable conditions?			Indeterminate	
(D) Has owner or operator provided immediate access to internal alarms? (if needed)			Indeterminate	

*Not Inspected

		Yes	No	NI*	Remarks
(E)	Is there adequate aisle space for unobstructed movement?	✓			In areas observed.

V. CONTINGENCY PLAN AND EMERGENCY PROCEDURES: (Part 265 Subpart D)

		Yes	No	NI*	Remarks
(A)	Does the Contingency Plan contain the following information:				
1.	The actions facility personnel must take to comply with §265.51 and 265.56 in response to fires, explosions, or any unplanned release of hazardous waste? (If the owner has a Spill Prevention, Control, and Countermeasures (SPCC) Plan, he needs only to amend that plan to incorporate hazardous waste management provisions that are sufficient to comply with the requirements of this Part (as applicable.)		✓		A contingency plan for the campus has not been established.
2.	Arrangements agreed by local police departments, fire departments hospitals, contractors, and State and local emergency response teams to coordinate emergency services pursuant to §265.37?		✓		
3.	Names, addresses, and phone numbers (office and home) of all persons qualified to act as emergency coordinators?		✓		
4.	A list of all emergency equipment at the facility which includes the location and physical description of each item on the list and a brief outline of its capabilities?		✓		
5.	An evacuation plan for facility personnel where there is a possibility that evacuation could be necessary? (This plan must describe signal(s) to be used to begin evacuation, evacuation routes, and alternate evacuation routes?)		✓		

*Not Inspected

	Yes	No	NI*	Remarks
(B) Are copies of the Contingency Plan available at site and local emergency organizations?		✓		
(C) Emergency Coordinator				
1. Is the facility Emergency Coordinator identified?		✓		
2. Is coordinator familiar with all aspects of site operation and emergency procedures?		✓		
3. Does the Emergency Coordinator have the authority to carry out the Contingency Plan?		✓		
(D) Emergency Procedures				
If an emergency situation has occurred at this facility, has the Emergency Coordinator followed the emergency procedures listed in 265.56?		N/A		

VI. MANIFEST SYSTEM, RECORDKEEPING, AND REPORTING
(Part 265 Subpart E)

	Yes	No	NI*	Remarks
(A) Use of Manifest System				
1. Does the facility follow the procedures listed in §265.71 for processing each manifest?		N/A		No waste is accepted from off-site
2. Are records of past shipments retained for 3 years?		N/A		
(B) Does the owner or operator meet requirements regarding manifest discrepancies?		N/A		

*Not Inspected

(C) Operating Record

1.	Does the owner or operator maintain an operating record as required in 265.73?	✓	
2.	Does the operating record contain the following information:		
**b.	The method(s) and date(s) of each waste's treatment, storage, or disposal as required in Appendix I?	✓	
c.	The location and quantity of each hazardous waste within the facility?	N/A	
***d.	A map or diagram of each cell or disposal area showing the location and quantity of each hazardous waste? (This information should be cross-referenced to specific manifest number, if waste was accompanied by a manifest.)	✓	
e.	Records and results of all waste analyses, trial tests, monitoring data, and operator inspections?	✓	
f.	Reports detailing all incidents that required implementation of the Contingency Plan?	✓	
g.	All closure and post closure costs as applicable? (Effective 5-19-81)	✓	

** See page 33252 of the May 19, 1980, Federal Register.

*** Only applies to disposal facilities

*Not Inspected

VII. CLOSURE AND POST CLOSURE
(Part 265 Subpart G)

	Yes	No	NI*	Remarks
(A) Closure and Post Closure				
1. Is the facility closure plan available for inspection by May 19, 1981?		✓		
2. Has this plan been submitted to the Regional Administrator		✓		
3. Has closure begun?		✓		
4. Is closure estimate available by May 19, 1981?		✓		
(B) Post closure care and use of property				
Has the owner or operator supplied a post closure monitoring plan? (effective by May 19, 1981)		N/A		

VIII. FACILITY STANDARDS
(Part 265, Subparts I thru R)

I
USE AND MANAGEMENT OF CONTAINERS

Facility Name: SIU-E Date of Inspection: 7/1/86

	Yes	No	NI*	Remarks
1. Are containers in good condition?	✓			
2. Are containers compatible with waste in them?	Indeterminate			Since some of the lab waste is unknown, compl with this Section could not be demonstrated.
3. Are containers stored closed?	✓			
4. Are containers managed to prevent leaks?	✓			
5. Are containers inspected weekly for leaks and defects?		✓		
6. Are ignitable & reactive wastes stored at least 15 meters (50 feet) from the facility property line? (Indicate if waste is ignitable or reactive.)	✓			

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	Yes	No	NI*	Remarks
7. Are incompatible wastes stored in separate containers? (If not, the provisions of 40 CFR 265.17(b) apply.)			Indeterminate	Same As 2.
8. Are containers of incompatible waste separated or protected from each other by physical barriers or sufficient distance?			Indeterminate	Same As 2

J
TANKS

Facility Name: _____ Date of Inspection: _____

	Yes	No	NI*	Remarks
1. Are tanks used to store only those wastes which will not cause corrosion, leakage or premature failure of the tank?			N/A	
2. Do uncovered tanks have at least 60 cm (2 feet) of freeboard, or dikes or other containment structures?				
3. Do continuous feed systems have a waste-feed cutoff?				
4. Are waste analyses done before the tanks are used to store a substantially different waste than before?				
5. Are required daily and weekly inspections done?				
6. Are reactive & ignitable wastes in tanks protected or rendered non-reactive or non-ignitable? Indicate if waste is ignitable or reactive. (If waste is rendered non-reactive or non-ignitable, see treatment requirements.)				
7. Are incompatible wastes stored in separate tanks? (If not, the provisions of 40 CFR 265.17(b) apply.)			✓	

*Not Inspected

	Yes	No	NI*	Remarks
3. Has the owner or operator addressed the waste analysis requirements of 265.402?	___	___	___	_____
4. Are inspection procedures followed according to 265.403?	___	___	___	_____
5. Are the special requirements fulfilled for ignitable or reactive wastes?	___	___	___	_____
6. Are incompatible wastes treated? (If yes, 265.17(b) applies.)	___	___	___	_____

Note: EPA has temporarily suspended the applicability of the requirements of the hazardo waste regulations in 40 CFR Parts 122, 264 and 265 to owners and operators of (1) wastewater treatment tanks that receive, store, and treat wastewaters that are hazardous waste or that generate, store or treat a wastewater treatment sludge whi is a hazardous waste where such wastewaters are subject to regulation under Sectio 402 or 307(b) of the Clean Water Act (33 U.S.C. 1251 et seq.) and (2) neutralizati tanks, transport vehicles, vessels, or containers which neutralize wastes which ar hazardous only because they exhibit the corrosivity characteristic under 40 CFR §2 or are listed as hazardous wastes in Subpart D of 40 CFR Part 261 only for this re

IX

Complete this section if the owner or operator of a TSD facility also generates hazardous waste that is subsequently shipped off-site for treatment, storage, or disposal.

1. MANIFEST REQUIREMENTS

	Yes	No	NI*	Remarks
(A) Does the operator have copies of the manifest available for review?	✓	___	___	A couple of shipments have been sent to Tw South lab waste storag area, however these manifests were not reviewed during today's inspection.
(B) Do the manifest forms reviewed contain the following information: (If possible, make copies of, or record information from, manifest(s) that do not contain the critical elements)				
1. Manifest document number?	___	___	✓	_____
2. Name, mailing address, telephone number, and EPA ID Number of Generator	___	___	✓	_____

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	Yes	No	NI*	Remarks
3. Name and EPA ID Number of Transporter(s)?			✓	
4. Name, address, and EPA ID Number of Designated permitted facility and alternate facility?			✓	
5. The description of the waste(s) (DOT shipping name, DOT hazard class, DOT identification number)?			✓	
6. The total quantity of waste(s) and the type and number of containers loaded?			✓	
7. Required certification?			✓	
8. Required signatures?			✓	
(C) Does the owner or operator submit exception reports when needed?		N/A		

2. PRE-TRANSPORT REQUIREMENTS

(A) Is waste packaged in accordance with DOT Regulations? (Required prior to movement of hazardous waste off-site)		N/A		No waste ready for shipment off-site
(B) Are waste packages marked and labeled in accordance with DOT regulations concerning hazardous waste materials? (Required to movement of hazardous waste off-site)		N/A		
(C) If required, are placards available to transporters of hazardous waste?		N/A		

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VI. RECORDKEEPING and REPORTING
(Part 262, Subpart D)

	Yes	No	NI*	Remarks
(A) Are Manifests, Annual Reports, Exception Reports, and all test results and analyses retained for at least three years?	✓			
(B) Has the generator submitted Annual Reports and Exception Reports as required?		✓		No annual reports have been filed

VII. INTERNATIONAL SHIPMENTS
(Part 262, Subpart E)

	Yes	No	NI*	Remarks
Has the installation imported or exported Hazardous Waste?		✓		

(If answered Yes, complete the following as applicable.)

	Yes	No	NI*	Remarks
1. Exporting Hazardous waste, has a generator:				
a. Notified the Administrator in writing?				
b. Obtained the signature of the foreign consignee confirming delivery of the waste(s) in the foreign country?				
c. Met the Manifest requirements?				
2. Importing Hazardous Waste, has the generator:				
Met the manifest requirements?				

*Not Inspected

REMARKS

Use this section to briefly describe site activities observed at the time of the inspection. Note any possible violations of Interim Status Standards.

An inspection at the subject facility was conducted to determine whether the facility should be regulated by RCRA. The inspection was conducted by Brent Harris and this writer. Upon arrival, we met with Dr. Emil Jason, Chairman of the Chemistry Dept., Mike Guerra, University Safety Coordinator, Dr. Donal Myer, Dean of the Science Dept. and Dirk Reif, Graduate Assistant.

The Science Dept. has been attempting to implement a hazardous waste management program for the University. However, they have been unsuccessful. Since the University is divided into many different departments, the Science Dept. has no jurisdiction to implement a RCRA Program for any of the other Departments. The Chemistry Department submitted a proposal to request additional funding to implement the program. Approval was denied pending the preparation of a report identifying all the units that generate hazardous wastes at the University. Since that time, the Chemistry Department has not been receiving the cooperation needed to allow them to compile such a report. On April 24, 1986, I spoke with Mr. Reif via telephone. He questioned the applicability of an inspection, since the Chemistry Department could not obtain information about the disposition of waste University wide. On July 1, 1986, such an inspection was conducted.

The following information was obtained:

1) All the waste from the student labs has been collected and put into storage. A volume determination could not be made, because there were approximately 300-400 bottles of various wastes. Dr. Jason estimated that there was about 2,000 to 3,000 pounds in storage, some of which were unknowns.

2) The waste from the research labs is not being collected and the disposition, type of waste and volume is unknown.

3) There are photographic labs in many of the different departments. Mr. Reif had identified eleven different labs. A twelfth lab was found during our inspection. All photographic waste is discharged to the sewer. A volume determination for all of the photographic waste generated on campus could not be made.

4) The print shop generates waste ink and solvent, however there was no waste present during our inspection and no volume determination or waste disposition was obtained.

5) The paint shop generates approximately one gallon of paint thinner per day, which is taken to the Auto Shop.

6) The Auto Shop's paint and solvent wastes, along with the Paint Shop's waste, are placed in 55 gallon drums. Per Mr. Guerra, "someone pumps out the drums and hauls it away". It was not determined during our inspection who was hauling it away, at what volume or to where.

7) The office machine repair shop has one parts washer which contains 1,1,1 Trichloroethane. We were told that the unit, which contains approximately fifteen gallons, is changed every six months. The spent solvent is given away to people to be used as weed killer.

There are many other areas on campus that we did not visit such as the Heating and Refrigeration Plant, the Art and Design Department and the Biology Department. Since the campus is separated by Departments, no central figure could be interviewed for answers concerning various waste generating units, volumes generated and types of waste generated. Therefore, based on the information obtained or lack of it, we could not pinpoint as to what type of RCRA facility the University is classified as, since most of the waste is generated and disposed of separately.

A CIL with 722.111 language will be sent to the facility. The letter will also include an apparent violation of Section 21(e) of the Act to cover the illegal disposal of wastes; i.e. photographic waste dumped in the drains. Upon determination that the facility is regulated as a TSD, the following apparent violations will also be alleged:

703.150
722.112
725.111
725.113
725.114
725.115
725.116
725.117
725.132
725.134
725.137
725.151
725.155
725.173
725.175
725.212
725.242
725.272
725.274
725.277

If the facility is regulated as a generator only, then the following apparent violations will be alleged: 722.112, all applicable portions of 722.134 and 722.141.

MDG:jlr/0141L

ENVIRONMENTAL PROTECTION AGENCY
INSPECTION REPORT

USEPA Number: NON-NOTIFIER IEPA Number: 1190255002

Facility Name: Southern Illinois University - Edwardsville

Street: Edwardsville Campus
City: Edwardsville Telephone: 618/692-2042
County: Madison State: Ill. Zip Code: 62026

Type of Facility: Notified As: Non-Notifier Regulated As: Gen
LDF? yes __ no __ HPV? yes __ no __ 90 Day Follow-up Required? yes __ no __

Region: 5 Date of Inspection: 12/2/86 From: 9:30 to 10:50
Weather (LDF Only): _____

Type of Inspection
ISS: ___ Sampling: ___ Citizen Complaint: __ Closed: __ Withdrawal: __
Record Review: __ Follow-up to Inspection of _____: __ Other: X
See Memo Dated

Non Regulated Status
Small Quant. Gen:: __ Claimed Nonhandler: __ Other(Specify in narrative): __

Notified As/Regulated As Matrix Number: ____ Key Letter: ____

Notification date, _____, from initial __ or subsequent __ notification.

Part A date, _____, from initial __ or amended __ Part A.

Part B permit application submitted? yes __ no __

Has the firm been referred to: USEPA? yes __ no __; IAG? yes __ no __; County States Attorney? yes __ no __. Date of referral to USEPA: _____, IAG: _____, County States Attorney: _____.

Federal Court Order Issued: _____ State Court Order Issued: _____

USEPA Compliance Order Issued: _____ Illinois PCB Order Issued: _____

TSD Facility Activity Summary

Activity(By Process Code)	On Pt A	Activity Conducted Prior to 1980	Was Activity Ever Done	Closed	Being Done at Time of Inspection	Exempt From Regulation per 35 IAC, Section:	On Annual Report For 8_ 8_ 8_

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DEC - 5 1986
IEPA-DLPC

000038

...or: _____ Telephone #: _____

...et: _____

...ty: _____ State: _____ Zip Code: _____

Owner: _____ Telephone #: _____

Street: _____

City: _____ State: _____ Zip Code: _____

Person Interviewed	Title	Telephone #
Dr. Emil Jason	Chairman Chemistry Dept	618/692-2042

Inspection Participants	Agency/Title	Telephone #
Pat McCarty	IEPA- EPS	618/345-4606
Mike Grant	IEPA- EPS	618/345-4606

Prepared By	Agency/Title	Telephone #
Michael D. Grant	IEPA- EPS	618/345-4606

Summary of Apparent Violations

Area	Class	Section

Area	Class	Section

Area	Class	Section

M E M O R A N D U M

DATE: February 9, 1987

TO: Division File

FROM: Mike MDG Grant

SUBJECT: 1190255002 - Madison County - Edwardsville/SIU-E- Science Building
ILD # Applied For
RCRA - FOS

On February 4, 1987, an ISS inspection was conducted at the University by Pat McCarthy and myself. Upon arrival, we met with Dr. Emil Jason, Chairman of the Chemistry Department, and Dirk Reif, Graduate Assistant. A Pre-Enforcement Conference was held with the subject facility on November 20, 1986. The facility was asked to submit waste determinations pursuant to 722.111 for the waste generated by the campus. On January 16, 1987, I received that submittal and resolved the violation.

As a result of this inspection, it was determined that there are two regulated facilities at the University. (See Attachment 1). Today's inspection only covered the activities at the Science Building. The activities at the Physical Plant were discussed, but a complete inspection was not conducted. Per the USEPA policy (Attachment 1), "where University campuses are divided by city streets, each section of the campus is considered a separate generator or small quantity generator." Therefore, only two of the campuses' sections are regulated. The hazardous waste generated by each of the other sections is less than 100 kg a month (conditionally exempt small quantity generator). The Physical Plant and the Science Building are generators of between 100 kgs and 1000 kgs. The Science Building is also regulated as a storage and treatment facility.

The Physical Plant generates approximately 60-70 gallons a month of solvent wastes. The generating points are the paint shop, office machine repair, and the print shop. These solvent wastes are taken to the Science Building where they are recycled and the reclaimed solvent is returned to the user. The recycling activities will be discussed later. Since it was determined that the Physical Plant is a separate facility, an inspection will be conducted to determine compliance with the Small Quantity Generator requirements. It should be noted that it was not determined that the Physical Plant was a separate regulated facility until after the ISS inspection and conversations with other Agency personnel.

The activities conducted at the Science Building are storage and treatment. This facility generates less than 1000 kgs a month and treats this waste on-site. Pursuant to 703.150(a)(3), generators of less than 1000 kgs per month, have until March 24, 1987 to file a Part A application, to be eligible for interim status. The facility's storage activities are a result of the recycling of the spent solvents from the Physical Plant. Since it was determined that the Physical Plant is an off-site facility, any length of time

the spent solvents are stored at the Science Building prior to recycling constitutes storage, pursuant to 721.106(c)(1). Although the Part A violation does not exist for the treatment of the waste generated by the Science Building, the storage of the spent solvents from the Physical Plant does constitute a violation. It should be noted that the spent solvents are usually stored less than a week before they are recycled. Other apparent violations also exist as a result of waste being taken from the Physical Plant to the Science Building, i.e., manifesting and obtaining a USEPA number. A map of the University is also attached, (Attachment 2) to show the two separate facilities.

The Science Building is establishing a program to handle the University's hazardous wastes. The wastes generated in the teaching labs are being treated. The solvent generated by the labs and the solvents received from the Physical Plant are reclaimed in one of two stills. Treatment of the lab wastes and distillation of the solvent, occurs in a lab specifically designated for this use. Treatment occurs in various size bottles and by various methods, i.e., reduction of chromium, neutralization, precipitation of metals. Logs are maintained which track the lab wastes from generation to treatment. Each bottle is given a unique number. Since the wastes are generated by the lab experiments in the classroom, the exact constituents of the wastes are known. This information is also available by cross-referencing the information maintained in the logs to the lab experiment instructions.

Several other wastestreams are generated, such as photographic waste and research lab wastes. These wastestreams are discharged to the facility's on-site NPDES permitted wastewater treatment plant. This method of waste handling is currently not being regulated by RCRA, but by the NPDES permitting program.

Since the University is a treatment and storage facility, the requirements of 722.134(d) are superseded by the 725 requirements, i.e., 180 days accumulation time and Subpart C of 725. The facility has already established a Contingency Plan, however, copies have not been sent to the local authorities. Although the training program has not been developed, it is scheduled for completion and implementation sometime in March. The facility's operating record is adequate for the treatment activities conducted, however, it needs to be amended to include the solvent waste accepted from the Physical Plant. A detailed waste analysis was not available for the spent solvent from the Physical Plant. The waste received from the Physical Plant is being accepted without a manifest. Additionally, no inspection records pursuant to 725.115 were presented. A closure plan and cost estimates have not yet been completed. The following violations will be alleged in a Pre-Enforcement Conference Letter:

1. 703.121
2. 703.150
3. 725.113
4. 725.115
5. 725.116
6. 725.137
7. 725.153
8. 725.173
9. 725.176
10. 725.212
11. 725.242
12. 725.274
13. 725.503

Since the same administration is in charge of the Physical Plant, a second Pre-Enforcement Conference Letter will be sent for that facility. The Pre-Enforcement Conference will allow us to explain the requirements which will apply to the Physical Plant, i.e., manifesting and notification, in relationship to the Science Building.

MDG:cas/0051L
Attachments

cc: DLPC - Collinsville
cc: USEPA - Region V
cc: Enforcement - Bruce Carlson
cc: Glenn Savage

DOC: 9451.02(83)
/ Wisc-SIL-E

Key Words: EPA I.D. Numbers, Small Quantity Generators

Regulations: 40 CFR 261.33(e), 260.10, 264.149

Subject: Assignment of Generator I.D. Numbers to Colleges and Universities

Addressee: N/A

Originator: Carolyn Barley, Project Officer, OSW, and Barbara Hostage, Project Officer, OER - RCRA Hotline Monthly Status Report-September 1983

Source Doc: See Miscellaneous [9560.11(83) Question #9]

Date: 10-19-83

Summary:

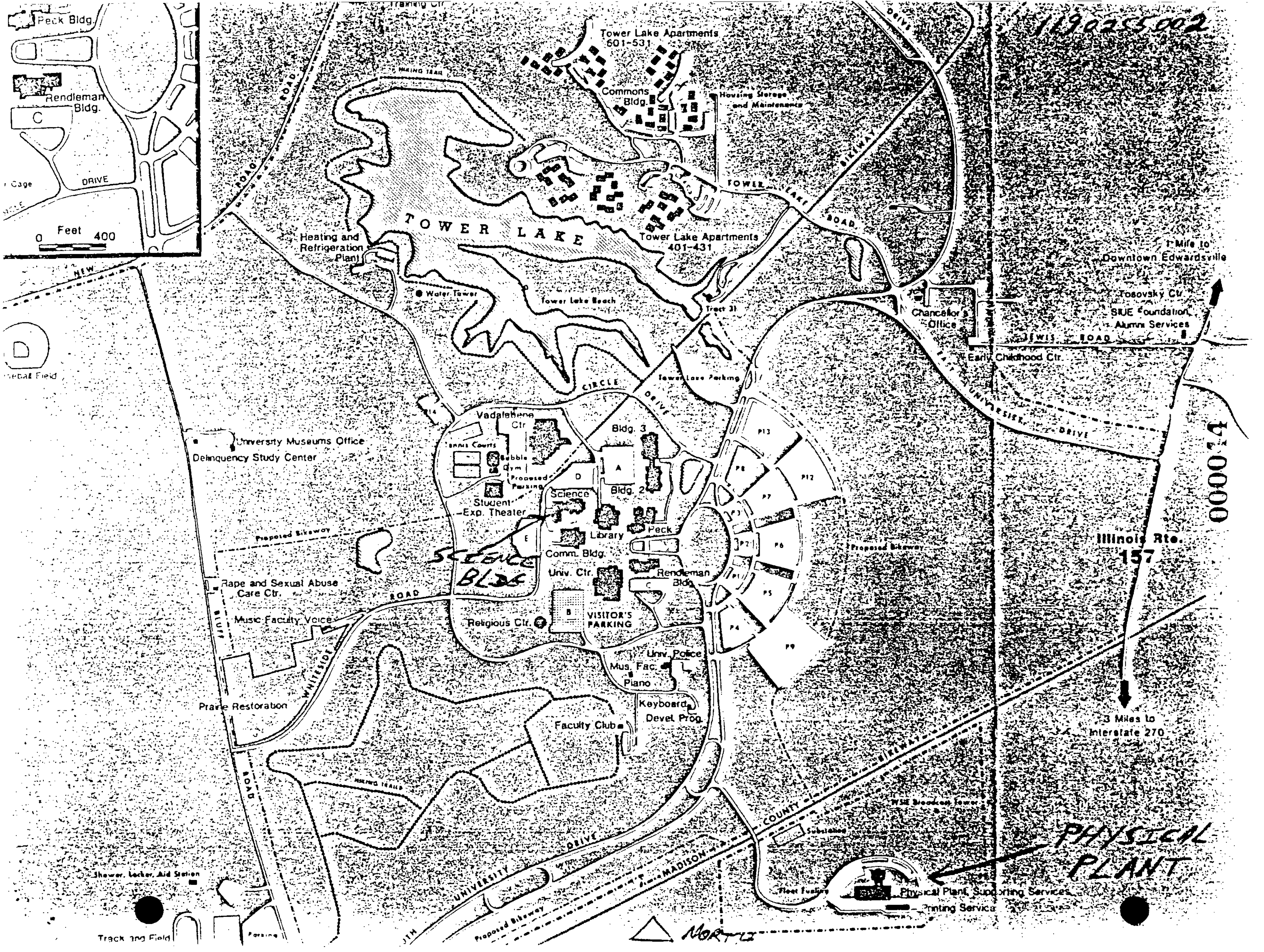
In assigning generator I.D. numbers to colleges and universities, the following configurations should be kept in mind:

a. A campus with several buildings on one contiguous piece of property would be considered a single or individual generation site even if one or more hazardous wastes are generated from one or more sources. One EPA I.D. number would be assigned. Small quantity generator status would be determined by the total hazardous waste generated or accumulated on the site.

b. Where university campuses are divided by city streets, each city block or section of the campus divided is considered a separate generator or small quantity generator. Each section would be given its own EPA I.D. number.

c. Where hazardous wastes are shipped from one building to another building, and the buildings are divided by a highway, a manifest would be needed while on the highway. The one exception is when the waste is shipped directly across the road. In this case, the receiving building is considered "on site," as defined in §260.10 even though both sites must have separate EPA I.D. numbers. The purpose here is to identify each shipment of hazardous waste as being from a specific location. EPA needs to identify who is responsible for the waste.

Taken from "RCRA Permit Policy Compendium: Summaries"



119025002
Peck Bldg.
Rendleman Bldg.
C
Cage
DRIVE
Feet
0
400
Tower Lake Apartments
601-531
Commons Bldg.
Housing Storage and Maintenance
TOWER LAKE
Tower Lake Apartments
401-431
Heating and Refrigeration Plant
Water Tower
Tower Lake Beach
Tract 31
TOWER LAKE ROAD
BIKEWAY
1 Mile to Downtown Edwardsville
Tosovsky Ctr.
SIUE Foundation
Alumni Services
Chancellor's Office
LEWIS ROAD
Early Childhood Ctr.
EAST UNIVERSITY DRIVE
Tower Lake Parking
CIRCLE DRIVE
NEW
Vadalabene Ctr.
Tennis Courts
Bubble Gym
Proposed Parking
University Museums Office
Delinquency Study Center
Bldg. 3
A
Bldg. 2
D
Science
Student Exp. Theater
Library
Peck
E
Comm. Bldg.
Univ. Ctr.
Rendleman Bldg.
C
SCIENCE BLDG
B
VISITOR'S PARKING
Religious Ctr.
Proposed Bikeway
Rape and Sexual Abuse Care Ctr.
Music Faculty Voice
BLUFF ROAD
WHITESIDE
Prairie Restoration
Univ. Police
Mus. Fac. Piano
Keyboard Devel. Prog.
Faculty Club
P13
P8
P12
P7
P3
P6
P2
P1
P5
P4
P9
P14
Illinois Rte. 157
1400000
3 Miles to Interstate 270
COUNTY BIKEWAY
WSIE Broadcast Tower
Substation
PHYSICAL PLANT
Physical Plant Supporting Services
Printing Service
Fleet Fueling
UNIVERSITY DRIVE
MADISON
Proposed Bikeway
NORTH
Shower, Locker, Aid Station
Track and Field
Parking

M E M O R A N D U M

DATE: March 4, 1987

TO: LPC - Division File

FROM: Mike MDG Grant

SUBJECT: 1190255002 - Madison County
Edwardsville/SIU-Edwardsville Science Building
RCRA - Compliance

On March 3, 1987, a Pre-Enforcement Conference was held with the University. The items discussed are those listed in the February 19, 1987 Pre-Enforcement Conference Letter. In attendance were Dr. Emil Jason, Chairman of the Chemistry Department, and Dr. Earl Beard, Vice President for Administration. Representing the Agency were Bruce Carlson, Pat McCarthy and myself.

A letter from the University is to be submitted by March 13, 1987 to Bruce Carlson listing the following scheduled compliance dates.

By March 24, 1987, the facility will file Part A of the Permit Application for the treatment and storage activities.

By March 31, 1987, the facility is to have submitted to this writer the following; the Inspection Log and completed records for the drum storage area and waste treatment area, the Training Program and records, the letters documenting arrangements with the local authorities and confirmation that copies of the Contingency Plan have been sent, and copies of the operating records used to track the solvent wastes.

By April 15, 1987 the facility is to submit to this writer the Wastes Procedures Manual (Waste Analysis Plan), and a copy of the Closure Plan and associated closure cost estimates.

It was agreed that the unmanifested waste report should not be filed until the Science Building and Physical Plant received the required permits and authorizations. Therefore, all wastes moved to the Science Building could be entered onto that report.

Upon receipt of the above mentioned submission, they will be reviewed for adequacy. If the submissions are adequate, the referenced violation will be resolved. If the submissions can be resolved with further information, it will be requested; if not, those referenced violations will be referred for enforcement.

MDG:jlr/0082L

cc: Bruce Carlson
cc: Bur Filson
cc: DLPC - Collinsville

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ENFORCEMENT PROGRAMS
MAR 11 1987
Environmental Protection Agency

ILLINOIS ENVIRONMENTAL PROTECTION AGENCY MEMORANDUM

DATE: April 24, 1987

TO: Division File

FROM: Mike MDG Grant

SUBJECT: 1190250008 - Madison County - Edwardsville/SIU-E Physical Plant
ILD981949803
RCRA Compliance

A record review was conducted on April 24, 1987 to determine the status of the apparent violations listed in the February 19, 1987 Pre-Enforcement Conference Letter and discussed during the March 3, 1987 conference. The facility was to have applied for a USEPA number notifying as a small quantity generator and transporter. An ILD number was assigned to the Physical Plant which is ILD981949803. The facility was to have also applied for a special waste hauling permit. This was also submitted and became effective April 22, 1987. The Physical Plant's hauler permit number is 2233. The second apparent violation listed in the February 19, 1987 PECL was concerning the shipment of waste to SIU-E's Science Building, which had not yet received their USEPA #. This violation has also been resolved. Therefore the violations listed in the February 19, 1987 PECL are now considered resolved.

MDG:pbo

cc: DLPC Collinsville
cc: Bur Filson
cc: Bruce Carlson

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APR 27 1987
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000046

EPA-90 (Rev. 6/75-20M)

M E M O R A N D U M

DATE: May 21, 1987

TO: LPC - Division File

FROM: Mike Grant - LPC - Collinsville

SUBJECT: 1190255008 - Madison County - Edwardsville/SIU-E Science Bldg.
ILD006331342
RCRA - FOS

The purpose of this memo is to once and for all set straight which USEPA ILD # has been assigned to the Science Building at the University. Although Brian Newquist and myself believed this situation had been taken care of, the USEPA printout of ILD #s dated May 8, 1987 showed differently. As discussed in my remarks to the April 17, 1987 RCRA Inspection Report, it was determined that ILD981801491 was the correct number to be used for the Science Building. Dr. Jason, Chairman of the Chemistry Department at the University used this number on the Part A application filed for the Science Building. At this point, it was assumed all parties had agreed this was the assigned number. However, the May 8, 1987 USEPA printout coded this ILD # as a duplicate and assigned ILD006331342 as the number for the Science Building. Brian Newquist contacted Sharon Kiddon of Region V to determine why this was changed. She told him this number was to be used by the facility and it could not be changed, because it was assigned to the original notification filed.

As a result of this, several problems now exist. The Part A application filed by the facility reflects the incorrect ILD #. Any manifests used or other related documentation established by the University also reflects the wrong number. All correspondence to and from the Science Building and memos authored by me since April 17, 1987 have the wrong number.

Please make note that ILD981801491 is a duplicate number and the correct number to be used for Southern Illinois University at Edwardsville Science Building is ILD006331342.

If any questions or confusion remain, please contact Brian Newquist or myself.

MDG:jlr/11

cc: Barb Ballard
cc: Gary King
cc: Permit Section
cc: Bur Filson
cc: Bruce Carlson
cc: Brian Newquest
cc: Cindy Ladage
cc: DLPC - Collinsville

M E M O R A N D U M

DATE: June 2, 1987

TO: LPC - Division File

FROM: Mike Grant

SUBJECT: 1190255002 - Madison County - Edwardsville/SIU-E Science Building

On May 28, 1987, I received a response from the subject facility. The response included the facility's unmanifested waste report, closure plan and cost estimate. This information was submitted as a result of a March 3, 1987 Pre-Enforcement Conference and a request during my last visit on April 17, 1987. As a result of this submittal, the apparent violations of Section 725.176, 725.212 and 725.242 are now considered resolved. There are two remaining apparent violations from the February 4, 1987 ISS inspection. The apparent violation of Section 703.150(a) (Part A) has been referred to the EDG requesting that it be forwarded to USEPA. The reason for the referral is to request that the USEPA issue an order granting the Science Building interim status for storage of wastes accepted from off-site (the Physical Plant - 1190250008). The apparent violation of Section 725.113(b) (Waste Analysis Plan) was addressed during the April 17, 1987 visit, however, it was still in its draft form. Dr. Jason indicated in the May 28, 1987 letter it will be forwarded as soon as possible.

MDG:jlr/21

cc: Bur Filson
cc: Bruce Carlson
cc: LPC - Collinsville

M E M O R A N D U M

DATE: July 30, 1987

TO: Division File - Land Pollution Control

FROM: Mike Grant

SUBJECT: 1190255002 - Madison County - Edwardsville/SIU-E Science Bldg.
ILD006331342
RCRA - Enforcement

On July 28, 1987, I received a copy of the subject facility's waste procedures manual. This manual constitutes the facility's waste analysis plan as required by Section 725.113(b). The plan includes handling of the spent solvent waste accepted from off-site (the Physical Plant). As a result, all violations identified during the February 4, 1987 ISS inspection have been resolved with the exception of Section 703.150(a). On June 26, 1987, the EDG decided this violation should be referred to the USEPA for the issuance of a Compliance Order. Since the facility cannot obtain interim status for the waste accepted from the Physical Plant (off-site), the Compliance Order will grant the facility interim status in lieu of filing a Part B at this time.

MDG:jlr/23

cc: LPC - Collinsville
cc: Bur Filson
cc: Bruce Carlson
cc: Glenn Savage

CONFIDENTIAL

1140250006

Approved OMB No. 2050-0028 Expires 9-30-88
GSA No 0246-EPA-OT

Please print or type with ELITE type (12 characters per inch) in the unshaded areas only

United States Environmental Protection Agency
Washington, DC 20460

EPA Notification of Hazardous Waste Activity

Please refer to the Instructions for Filing Notification before completing this form. The information requested here is required by law (Section 3010 of the Resource Conservation and Recovery Act).

For Official Use Only

Comments

N

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DEC 10 1986
IEPA-DLPC

Installation's EPA ID Number	T/A C	Approved	Date Received (yr. mo. day)
ILD981949803	1	A	87/12/18

I. Name of Installation

SOUTHERN ILLINOIS UNIVERSITY

II. Installation Mailing Address

Street or P.O. Box: Box 1151

City or Town: Edwardsville — State: IL — ZIP Code: 62026

III. Location of Installation

Street or Route Number: PHYSICAL PLANT

City or Town: Edwardsville — State: IL — ZIP Code: 62026

IV. Installation Contact

Name and Title (last, first, and job title): Jason Emil Coord.

Phone Number (area code and number): 618 692 2042

V. Ownership

A. Name of Installation's Legal Owner: Southern Ill Univ.

B. Type of Ownership (enter code): P

VI. Type of Regulated Waste Activity (Mark 'X' in the appropriate boxes. Refer to instructions.)

A. Hazardous Waste Activity

- 1a. Generator
- [X] 1b. Less than 1,000 kg/mo.
- [ ] 2. Transporter
- [ ] 3. Treater/Storer/Disposer
- [ ] 4. Underground Injection
- [ ] 5. Market or Burn Hazardous Waste Fuel *(enter 'X' and mark appropriate boxes below)*
  - [ ] a. Generator Marketing to Burner
  - [ ] b. Other Marketer
  - [ ] c. Burner

B. Used Oil Fuel Activities

- [ ] 6. Off-Specification Used Oil Fuel *(enter 'X' and mark appropriate boxes below)*
  - [ ] a. Generator Marketing to Burner
  - [ ] b. Other Marketer
  - [ ] c. Burner
- [ ] 7. Specification Used Oil Fuel Marketer *(or On site Burner)* Who First Claims the Oil Meets the Specification

DEC 18 1986
U.S. EPA, REGION V

VII. Waste Fuel Burning: Type of Combustion Device *(enter 'X' in all appropriate boxes to indicate type of combustion device(s) in which hazardous waste fuel or off-specification used oil fuel is burned. See instructions for definitions of combustion devices.)*

- [ ] A. Utility Boiler
- [ ] B. Industrial Boiler
- [ ] C. Industrial Furnace

VIII. Mode of Transportation *(transporters only — enter 'X' in the appropriate box(es)*

- [ ] A. Air
- [ ] B. Rail
- [ ] C. Highway
- [ ] D. Water
- [ ] E. Other *(specify)*

MADISON-119

IX. First or Subsequent Notification

Mark 'X' in the appropriate box to indicate whether this is your installation's first notification of hazardous waste activity or a subsequent notification. If this is not your first notification, enter your installation's EPA ID Number in the space provided below.

- [X] A. First Notification
- [ ] B. Subsequent Notification *(complete item C)*

C. Installation's EPA ID Number

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MAR 20 1987

EPA Form 8700-12 (Rev. 11-85) Previous edition is obsolete. 000050

Continue on reverse

C														T/A	C
W															1

D. Description of Hazardous Wastes *(continued from front)*

1. Hazardous Wastes from Nonspecific Sources. Enter the four-digit number from 40 *CFR* Part 261.31 for each listed hazardous waste from nonspecific sources your installation handles. Use additional sheets if necessary.

1	2	3	4	5	6
F 0 0 1	F 0 0 2	F 0 0 3	F 0 0 4	F 0 0 5	
7	8	9	10	11	12

2. Hazardous Wastes from Specific Sources. Enter the four-digit number from 40 *CFR* Part 261.32 for each listed hazardous waste from specific sources your installation handles. Use additional sheets if necessary.

13	14	15	16	17	18
19	20	21	22	23	24
25	26	27	28	29	30

3. Commercial Chemical Product Hazardous Wastes. Enter the four-digit number from 40 *CFR* Part 261.33 for each chemical substance your installation handles which may be a hazardous waste. Use additional sheets if necessary.

31	32	33	34	35	36
37	38	39	40	41	42
43	44	45	46	47	48

4. Listed Infectious Wastes. Enter the four-digit number from 40 *CFR* Part 261.34 for each hazardous waste from hospitals, veterinary hospitals, or medical and research laboratories your installation handles. Use additional sheets if necessary.

49	50	51	52	53	54

E. Characteristics of Nonlisted Hazardous Wastes. Mark 'X' in the boxes corresponding to the characteristics of nonlisted hazardous wastes your installation handles. *(See 40 CFR Parts 261.21 — 261.24)*

- [X] 1. Ignitable *(D001)*
- [X] 2. Corrosive *(D002)*
- [X] 3. Reactive *(D003)*
- [X] 4. Toxic *(D000)*

XI. Certification

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

Signature	Name and Official Title *(type or print)*	Date Signed
Emil Jason	Emil F. Jason, Acting Coordinator	December 3, 1986

EPA Form 8700-12 (Rev. 11-85) Reverse

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DEC 10 1986
IEPA-DLPC

TSD

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Form Approved. OMB No 2050-0028 Expires 9-30-88
GSA No 0246-EPA-OT

United States Environmental Protection Agency
Washington, DC 20460

87.6037

EPA Notification of Hazardous Waste Activity

Please refer to the *Instructions for filing Notification* before completing this form. The information requested here is required by law (Section 3010 of the Resource Conservation and Recovery Act).

For Official Use Only

Comments

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IEPA-DLPC

Installation's EPA ID Number	T/A	C	Approved	Date Received (yr. mo. day)
I L D 9 8 1 8 0 1 4 9 1		1	A	8 7 0 2 2 3

I. Name of Installation

SOUTHERN ILLINOIS UNIVERSITY- Science BLDG

II. Installation Mailing Address

Street or P.O. Box

B O X I 6 5 2

City or Town	State	ZIP Code
E d w a r d s v i l l e	I L	6 2 0 2 6

III. Location of Installation

Street or Route Number

RTE 157

City or Town	State	ZIP Code
E d w a r d s v i l l e	I L	6 2 0 2 6

IV. Installation Contact

Name and Title (last, first, and job title)	Phone Number (area code and number)
J a s o n E m i l C o o r d.	6 1 8 6 9 2 2 0 4 2

V. Ownership

A. Name of Installation's Legal Owner	B. Type of Ownership (enter code)
S o u t h e r n I l l U n i v.	S

VI. Type of Regulated Waste Activity (Mark 'X' in the appropriate boxes. Refer to Instructions.)

A. Hazardous Waste Activity

- ☐ 1. Generator
- ☐ 2. Transporter
- ☒ 3. Treater/Storer/Disposer
- ☐ 4. Underground Injection
- ☐ 5. Market or Burn Hazardous Waste Fuel (enter 5C and mark appropriate boxes below)
  - ☐ a. Generator Marketing to Burner
  - ☐ b. Other Marketer
  - ☐ c. Burner
- ☐ 6. Small Quantity Generator (less than 1,000 kg/mo.)

B. Used Oil Fuel Activities

- ☐ a. Off-Specification Used Oil Fuel (enter 'X' and mark appropriate boxes below)
  - ☐ a. Generator Marketing to Burner
  - ☐ b. Other Marketer
  - ☐ c. Burner
- ☐ 7. Specification Used Oil Fuel Marketer (for On-site Burner) Who First Claims the Oil Meets the Specification

VII. Waste Fuel Burning: Type of Combustion Device (enter 'X' in all appropriate boxes to indicate type of combustion device(s) in which hazardous waste fuel or off-specification used oil fuel is burned. See instructions for definitions of combustion devices.)

☐ A. Utility Boiler ☐ B. Industrial Boiler ☐ C. Industrial Furnace

VIII. Mode of Transportation (transporters only — enter 'X' in the appropriate box(es))

☐ A. Air ☐ B. Rail ☐ C. Highway ☐ D. Water ☐ E. Other (specify) MADISON - I/9

IX. First or Subsequent Notification

Mark 'X' in the appropriate box to indicate whether this is your installation's first notification of hazardous waste activity or a subsequent notification. If this is not your first notification, enter your installation's EPA ID Number in the space provided below.

☒ A. First Notification ☐ B. Subsequent Notification (complete item C)

C. Installation's EPA ID Number

ID — For Official Use Only			
C		T/A	C
W			1

X. Description of Hazardous Wastes *(continued from front)*

A. Hazardous Wastes from Nonspecific Sources. Enter the four-digit number from 40 CFR Part 261.31 for each listed hazardous waste from nonspecific sources your installation handles. Use additional sheets if necessary.

1	2	3	4	5	6
F001	F002	F003	F004	F005	
7	8	9	10	11	12

B. Hazardous Wastes from Specific Sources. Enter the four-digit number from 40 CFR Part 261.32 for each listed hazardous waste from specific sources your installation handles. Use additional sheets if necessary.

13	14	15	16	17	18
19	20	21	22	23	24
25	26	27	28	29	30

C. Commercial Chemical Product Hazardous Wastes. Enter the four-digit number from 40 CFR Part 261.33 for each chemical substance your installation handles which may be a hazardous waste. Use additional sheets if necessary.

31	32	33	34	35	36
37	38	39	40	41	42
43	44	45	46	47	48

D. Listed Infectious Wastes. Enter the four-digit number from 40 CFR Part 261.34 for each hazardous waste from hospitals, veterinary hospitals, or medical and research laboratories your installation handles. Use additional sheets if necessary.

49	50	51	52	53	54

E. Characteristics of Nonlisted Hazardous Wastes. Mark 'X' in the boxes corresponding to the characteristics of nonlisted hazardous wastes your installation handles. *(See 40 CFR Parts 261.21 — 261.24)*

- [X] 1. Ignitable (D001)
- [X] 2. Corrosive (D002)
- [X] 3. Reactive (D003)
- [X] 4. Toxic (D000)

XI. Certification

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

Signature	Name and Official Title *(type or print)*	Date Signed
Emil F. Jason	Emil F. Jason, Acting Coordinator	January 7, 1987

EPA Form 8700-12 (Rev. 11-85) Reverse

000053

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FEB - 6 1987

Form Approved O.M.B No. 158-R0175

FORM 1 GENERAL

EPA

ENVIRONMENTAL PROTECTION AGENCY

GENERAL INFORMATION

Consolidated Permits Program

(Read the "General Instructions" before starting.)

I. EPA I.D. NUMBER: F ILD981801491

LABEL ITEMS

I. EPA I.D. NUMBER

III. FACILITY NAME

V. FACILITY MAILING ADDRESS

VI. FACILITY LOCATION

PLEASE PLACE LABEL IN THIS SPACE

GENERAL INSTRUCTIONS

If a preprinted label has been provided, affix it in the designated space. Review the information carefully; if any of it is incorrect, cross through it and enter the correct data in the appropriate fill—in area below. Also, if any of the preprinted data is absent *(the area to the left of the label space lists the information that should appear)*, please provide it in the proper fill—in area(s) below. If the label is complete and correct, you need not complete Items I, III, V, and VI *(except VI-B which must be completed regardless)*. Complete all items if no label has been provided. Refer to the instructions for detailed item descriptions and for the legal authorizations under which this data is collected.

II. POLLUTANT CHARACTERISTICS

INSTRUCTIONS: Complete A through J to determine whether you need to submit any permit application forms to the EPA. If you answer "yes" to any questions, you must submit this form and the supplemental form listed in the parenthesis following the question. Mark "X" in the box in the third column if the supplemental form is attached. If you answer "no" to each question, you need not submit any of these forms. You may answer "no" if your activity is excluded from permit requirements; see Section C of the instructions. See also, Section D of the instructions for definitions of bold—faced terms.

SPECIFIC QUESTIONS	MARK 'X' YES	NO	FORM ATTACHED
A. Is this facility a publicly owned treatment works which results in a discharge to waters of the U.S.? (FORM 2A)		X	
B. Does or will this facility *(either existing or proposed)* include a concentrated animal feeding operation or aquatic animal production facility which results in a discharge to waters of the U.S.? (FORM 2B)		X	
C. Is this a facility which currently results in discharges to waters of the U.S. other than those described in A or B above? (FORM 2C)		X	
D. Is this a proposed facility *(other than those described in A or B above)* which will result in a discharge to waters of the U.S.? (FORM 2D)		X	
E. Does or will this facility treat, store, or dispose of hazardous wastes? (FORM 3)	X		
F. Do you or will you inject at this facility industrial or municipal effluent below the lowermost stratum containing, within one quarter mile of the well bore, underground sources of drinking water? (FORM 4)		X	
G. Do you or will you inject at this facility any produced water or other fluids which are brought to the surface in connection with conventional oil or natural gas production, inject fluids used for enhanced recovery of oil or natural gas, or inject fluids for storage of liquid hydrocarbons? (FORM 4)		X	
H. Do you or will you inject at this facility fluids for special processes such as mining of sulfur by the Frasch process, solution mining of minerals, in situ combustion of fossil fuel, or recovery of geothermal energy? (FORM 4)		X	
I. Is this facility a proposed stationary source which is one of the 28 industrial categories listed in the instructions and which will potentially emit 100 tons per year of any air pollutant regulated under the Clean Air Act and may affect or be located in an attainment area? (FORM 5)		X	
J. Is this facility a proposed stationary source which is NOT one of the 28 industrial categories listed in the instructions and which will potentially emit 250 tons per year of any air pollutant regulated under the Clean Air Act and may affect or be located in an attainment area? (FORM 5)		X	

III. NAME OF FACILITY

SKIP

V. FACILITY CONTACT

A. NAME & TITLE *(last, first, & title)*: Jason Emil Acting Coordinator

B. PHONE *(area code & no.)*: 618 692 2042

VI. FACILITY MAILING ADDRESS

A. STREET OR P.O. BOX: Campus Box 1652

B. CITY OR TOWN: Edwardsville

C. STATE: IL

D. ZIP CODE: 62026

RECEIVED
IEPA
APR 14 1987
COLLINSVILLE

VII. FACILITY LOCATION

A. STREET, ROUTE NO. OR OTHER SPECIFIC IDENTIFIER: Route 157

B. COUNTY NAME: Madison

C. CITY OR TOWN: Edwardsville

D. STATE: IL

E. ZIP CODE: 62026

F. COUNTY CODE *(if known)*:

000054

VII. SIC CODES (4-digit, in order of priority)

A. FIRST	B. SECOND
C 7 (specify)	C 7 (specify)
C. THIRD	**D. FOURTH**
C 7 (specify)	C 7 (specify)

VIII. OPERATOR INFORMATION

A. NAME

C 8 SOUTHERN ILLINOIS UNIVERSITY EDWARDSVILLE

B. Is the name listed in Item VIII-A also the owner? [X] YES [ ] NO (66)

C. STATUS OF OPERATOR (Enter the appropriate letter into the answer box; if "Other", specify.)

F = FEDERAL; S = STATE; P = PRIVATE; M = PUBLIC (other than federal or state); O = OTHER (specify)

S (specify)

D. PHONE (area code & no.)

C A 618 692 2042

E. STREET OR P.O. BOX

Route 157

F. CITY OR TOWN

C 8 Edwardsville

G. STATE IL

H. ZIP CODE 62026

IX. INDIAN LAND

Is the facility located on Indian lands? [ ] YES [X] NO (52)

X. EXISTING ENVIRONMENTAL PERMITS

A. NPDES (Discharges to Surface Water)	D. PSD (Air Emissions from Proposed Sources)
C T I 9 N IL0046761	C T I 9 P None
B. UIC (Underground Injection of Fluids)	**E. OTHER (specify)**
C T I 9 U None	C T I 9 None (specify)
C. RCRA (Hazardous Wastes)	**E. OTHER (specify)**
C T I 9 R None	C T I 9 None (specify)

XI. MAP

Attach to this application a topographic map of the area extending to at least one mile beyond property bounderies. The map must show the outline of the facility, the location of each of its existing and proposed intake and discharge structures, each of its hazardous waste treatment, storage, or disposal facilities, and each well where it injects fluids underground. Include all springs, rivers and other surface water bodies in the map area. See instructions for precise requirements.

XII. NATURE OF BUSINESS (provide a brief description)

Educational Institution: Southern Illinois University at Edwardsville

XIII. CERTIFICATION (see instructions)

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this application and all attachments and that, based on my inquiry of those persons immediately responsible for obtaining the information contained in the application, I believe that the information is true, accurate and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

A. NAME & OFFICIAL TITLE (type or print)	B. SIGNATURE	C. DATE SIGNED
Emil F. Jason Acting Coordinator	Emil Jason	3/23/84

COMMENTS FOR OFFICIAL USE ONLY

FORM 3 RCRA — EPA

ENVIRONMENTAL PROTECTION AGENCY
HAZARDOUS WASTE PERMIT APPLICATION

Consolidated Permits Program

(This information is required under Section 3005 of RCRA.)

I. EPA I.D. NUMBER

F	I	L	D	9	8	1	8	0	1	4	9	1

FOR OFFICIAL USE ONLY

APPLICATION APPROVED	DATE RECEIVED (yr., mo., & day)	COMMENTS

II. FIRST OR REVISED APPLICATION

Place an "X" in the appropriate box in A or B below *(mark one box only)* to indicate whether this is the first application you are submitting for your facility or a revised application. If this is your first application and you already know your facility's EPA I.D. Number, or if this is a revised application, enter your facility's EPA I.D. Number in Item I above.

A. FIRST APPLICATION *(place an "X" below and provide the appropriate date)*

☐ 1. EXISTING FACILITY *(See instructions for definition of "existing" facility. Complete item below.)*

FOR EXISTING FACILITIES, PROVIDE THE DATE (yr., mo., & day) OPERATION BEGAN OR THE DATE CONSTRUCTION COMMENCED *(use the boxes to the left)*

C	YR.	MO.	DAY
8			

☒ 2. NEW FACILITY *(Complete item below.)*

FOR NEW FACILITIES PROVIDE THE DATE (yr., mo., & day) OPERATION BEGAN OR IS EXPECTED TO BEGIN

YR.	MO.	DAY
8 4	0 7	0 1

B. REVISED APPLICATION *(place an "X" below and complete Item I above)*

☐ 1. FACILITY HAS INTERIM STATUS

☐ 2. FACILITY HAS A RCRA PERMIT

III. PROCESSES – CODES AND DESIGN CAPACITIES

A. PROCESS CODE – Enter the code from the list of process codes below that best describes each process to be used at the facility. Ten lines are provided for entering codes. If more lines are needed, enter the code(s) in the space provided. If a process will be used that is not included in the list of codes below, then describe the process *(including its design capacity)* in the space provided on the form *(Item III-C)*.

B. PROCESS DESIGN CAPACITY – For each code entered in column A enter the capacity of the process.

1. AMOUNT – Enter the amount.
2. UNIT OF MEASURE – For each amount entered in column B(1), enter the code from the list of unit measure codes below that describes the unit of measure used. Only the units of measure that are listed below should be used.

PROCESS	PROCESS CODE	APPROPRIATE UNITS OF MEASURE FOR PROCESS DESIGN CAPACITY
Storage:		
CONTAINER *(barrel, drum, etc.)*	S01	GALLONS OR LITERS
TANK	S02	GALLONS OR LITERS
WASTE PILE	S03	CUBIC YARDS OR CUBIC METERS
SURFACE IMPOUNDMENT	S04	GALLONS OR LITERS
Disposal:		
INJECTION WELL	D79	GALLONS OR LITERS
LANDFILL	D80	ACRE-FEET *(the volume that would cover one acre to a depth of one foot)* OR HECTARE-METER
LAND APPLICATION	D81	ACRES OR HECTARES
OCEAN DISPOSAL	D82	GALLONS PER DAY OR LITERS PER DAY
SURFACE IMPOUNDMENT	D83	GALLONS OR LITERS
Treatment:		
TANK	T01	GALLONS PER DAY OR LITERS PER DAY
SURFACE IMPOUNDMENT	T02	GALLONS PER DAY OR LITERS PER DAY
INCINERATOR	T03	TONS PER HOUR OR METRIC TONS PER HOUR; GALLONS PER HOUR OR LITERS PER HOUR
OTHER *(Use for physical, chemical, thermal or biological treatment processes not occurring in tanks, surface impoundments or incinerators. Describe the processes in the space provided; Item III-C.)*	T04	GALLONS PER DAY OR LITERS PER DAY

UNIT OF MEASURE	UNIT OF MEASURE CODE
GALLONS	G
LITERS	L
CUBIC YARDS	Y
CUBIC METERS	C
GALLONS PER DAY	U
LITERS PER DAY	V
TONS PER HOUR	D
METRIC TONS PER HOUR	W
GALLONS PER HOUR	E
LITERS PER HOUR	H
ACRE-FEET	A
HECTARE-METER	F
ACRES	B
HECTARES	Q

EXAMPLE FOR COMPLETING ITEM III *(shown in line numbers X-1 and X-2 below)*: A facility has two storage tanks, one tank can hold 200 gallons and the other can hold 400 gallons. The facility also has an incinerator that can burn up to 20 gallons per hour.

C DUP T/A C 1

LINE NUMBER	A. PROCESS CODE (from list above)	B. PROCESS DESIGN CAPACITY 1. AMOUNT (specify)	B. PROCESS DESIGN CAPACITY 2. UNIT OF MEASURE (enter code)	FOR OFFICIAL USE ONLY	LINE NUMBER	A. PROCESS CODE (from list above)	B. PROCESS DESIGN CAPACITY 1. AMOUNT	B. PROCESS DESIGN CAPACITY 2. UNIT OF MEASURE (enter code)	FOR OFFICIAL USE ONLY
X-1	S 0 2	600	G		5				
X-2	T 0 3	20	E		6				
1	S 0 1	200	G		7				
2	0 4	Other 10	U		8				
3					9				
4					10	000056			

III. PROCESSES (continued)

C. SPACE FOR ADDITIONAL PROCESS CODES OR FOR DESCRIBING OTHER PROCESSES (code "T04"). FOR EACH PROCESS ENTERED HERE INCLUDE DESIGN CAPACITY.

Distillation for solvent reclamation - 2-5 gal/day
Precipitation of metals from aqueous solution - 1-5 gal/day
Neutralization of corrosives - 1-5 gal/day
Evaporation (water) to reduce volume - 1-2 gal/day
Oxidation/reduction and other specialized chemical methods following known procedures to convert certain hazardous material into non-hazardous material as needed - 0.1 gal - 0.5 gal/day

V. DESCRIPTION OF HAZARDOUS WASTES

A. EPA HAZARDOUS WASTE NUMBER — Enter the four-digit number from 40 CFR, Subpart D for each listed hazardous waste you will handle. If you handle hazardous wastes which are not listed in 40 CFR, Subpart D, enter the four-digit number(s) from 40 CFR, Subpart C that describes the characteristics and/or the toxic contaminants of those hazardous wastes.

B. ESTIMATED ANNUAL QUANTITY — For each listed waste entered in column A estimate the quantity of that waste that will be handled on an annual basis. For each characteristic or toxic contaminant entered in column A estimate the total annual quantity of all the non-listed waste(s) that will be handled which possess that characteristic or contaminant.

C. UNIT OF MEASURE — For each quantity entered in column B enter the unit of measure code. Units of measure which must be used and the appropriate codes are:

ENGLISH UNIT OF MEASURE	CODE	METRIC UNIT OF MEASURE	CODE
POUNDS	P	KILOGRAMS	K
TONS	T	METRIC TONS	M

If facility records use any other unit of measure for quantity, the units of measure must be converted into one of the required units of measure taking into account the appropriate density or specific gravity of the waste.

D. PROCESSES

1. PROCESS CODES:
   For listed hazardous waste: For each listed hazardous waste entered in column A select the code(s) from the list of process codes contained in Item III to indicate how the waste will be stored, treated, and/or disposed of at the facility.
   For non-listed hazardous wastes: For each characteristic or toxic contaminant entered in column A, select the code(s) from the list of process codes contained in Item III to indicate all the processes that will be used to store, treat, and/or dispose of all the non-listed hazardous wastes that possess that characteristic or toxic contaminant.
   Note: Four spaces are provided for entering process codes. If more are needed: (1) Enter the first three as described above; (2) Enter "000" in the extreme right box of Item IV-D(1); and (3) Enter in the space provided on page 4, the line number and the additional code(s).

2. PROCESS DESCRIPTION: If a code is not listed for a process that will be used, describe the process in the space provided on the form.

NOTE: HAZARDOUS WASTES DESCRIBED BY MORE THAN ONE EPA HAZARDOUS WASTE NUMBER — Hazardous wastes that can be described by more than one EPA Hazardous Waste Number shall be described on the form as follows:

1. Select one of the EPA Hazardous Waste Numbers and enter it in column A. On the same line complete columns B,C, and D by estimating the total annual quantity of the waste and describing all the processes to be used to treat, store, and/or dispose of the waste.
2. In column A of the next line enter the other EPA Hazardous Waste Number that can be used to describe the waste. In column D(2) on that line enter "included with above" and make no other entries on that line.
3. Repeat step 2 for each other EPA Hazardous Waste Number that can be used to describe the hazardous waste.

EXAMPLE FOR COMPLETING ITEM IV (shown in line numbers X-1, X-2, X-3, and X-4 below) — A facility will treat and dispose of an estimated 900 pounds per year of chrome shavings from leather tanning and finishing operation. In addition, the facility will treat and dispose of three non-listed wastes. Two wastes are corrosive only and there will be an estimated 200 pounds per year of each waste. The other waste is corrosive and ignitable and there will be an estimated 200 pounds per year of that waste. Treatment will be in an incinerator and disposal will be in a landfill.

LINE NO.	A. EPA HAZARD. WASTE NO. (enter code)	B. ESTIMATED ANNUAL QUANTITY OF WASTE	C. UNIT OF MEASURE (enter code)	D. PROCESSES 1. PROCESS CODES (enter)	D. PROCESSES 2. PROCESS DESCRIPTION (If a code is not entered in D(1))
X-1	K 0 5 4	900	P	T 0 3 D 8 0	
X-2	D 0 0 2	400	P	T 0 3 D 8 0	
X-3	D 0 0 1	100	P	T 0 3 D 8 0	
X-4	D 0 0 2			000057	included with above

Continued from page 2.
NOTE: Photocopy this page before completing if you have more than 26 wastes to list.

Form Approved OMB No. 158-S80004

EPA I.D. NUMBER (enter from page 1)	FOR OFFICIAL USE ONLY
W	W DUP 2 DUP

V. DESCRIPTION OF HAZARDOUS WASTES (continued)

LINE NO.	A. EPA HAZARD. WASTE NO (enter code)	B. ESTIMATED ANNUAL QUANTITY OF WASTE	C. UNIT OF MEASURE (enter code)	D. PROCESSES 1. PROCESS CODES (enter)	D. PROCESSES 2. PROCESS DESCRIPTION (If a code is not entered in D(1))
1	D001	10,000	P	S01 T04	
2	D002	3,500	P	S01 T04	
3	D003	12	P	S01 T04	
4	D000	25	P	S01 T04	
5					
6					
7					
8					
9					
10					
11					
12					
13					
14					
15					
16					
17					
18					
19					
20					
21					
22					
23					
24					
25					
26					

000058

EPA Form 3510-3 (6-80)

CONTINUE ON REVERSE

ontinued from the front.

V. DESCRIPTION OF HAZARDOUS WA[illegible]S (continued)

E. USE THIS SPACE TO LIST ADDITIONAL PROCESS CODES FROM ITEM D(1) ON PAGE 3.

EPA I.D. NO. (enter from page 1)

												T/N	C
I	L	D	0	8	1	8	0	1	4	9	1		6

V. FACILITY DRAWING

All existing facilities must include in the space provided on page 5 a scale drawing of the facility *(see instructions for more detail).*

VI. PHOTOGRAPHS

All existing facilities must include photographs *(aerial or ground—level)* that clearly delineate all existing structures; existing storage, treatment and disposal areas; and sites of future storage, treatment or disposal areas *(see instructions for more detail).*

VII. FACILITY GEOGRAPHIC LOCATION

LATITUDE (degrees, minutes, & seconds)	LONGITUDE (degrees, minutes, & seconds)
See maps of Form 1	See maps of Form 1

VIII. FACILITY OWNER

☐ A. If the facility owner is also the facility operator as listed in Section VIII on Form 1, "General Information", place an "X" in the box to the left and skip to Section IX below.

B. If the facility owner is not the facility operator as listed in Section VIII on Form 1, complete the following items:

1. NAME OF FACILITY'S LEGAL OWNER	2. PHONE NO. (area code & no.)
Southern Illinois University at Edwardsville	6 1 8 - 6 9 2 - 2 0 4 2

3. STREET OR P.O. BOX	4. CITY OR TOWN	5. ST.	6. ZIP CODE
Route 157	C G Edwardsville	I L	6 2 0 2 6

IX. OWNER CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

A. NAME (print or type)	B. SIGNATURE	C. DATE SIGNED
Emil F. Jason	Emil Jason	3/23/87

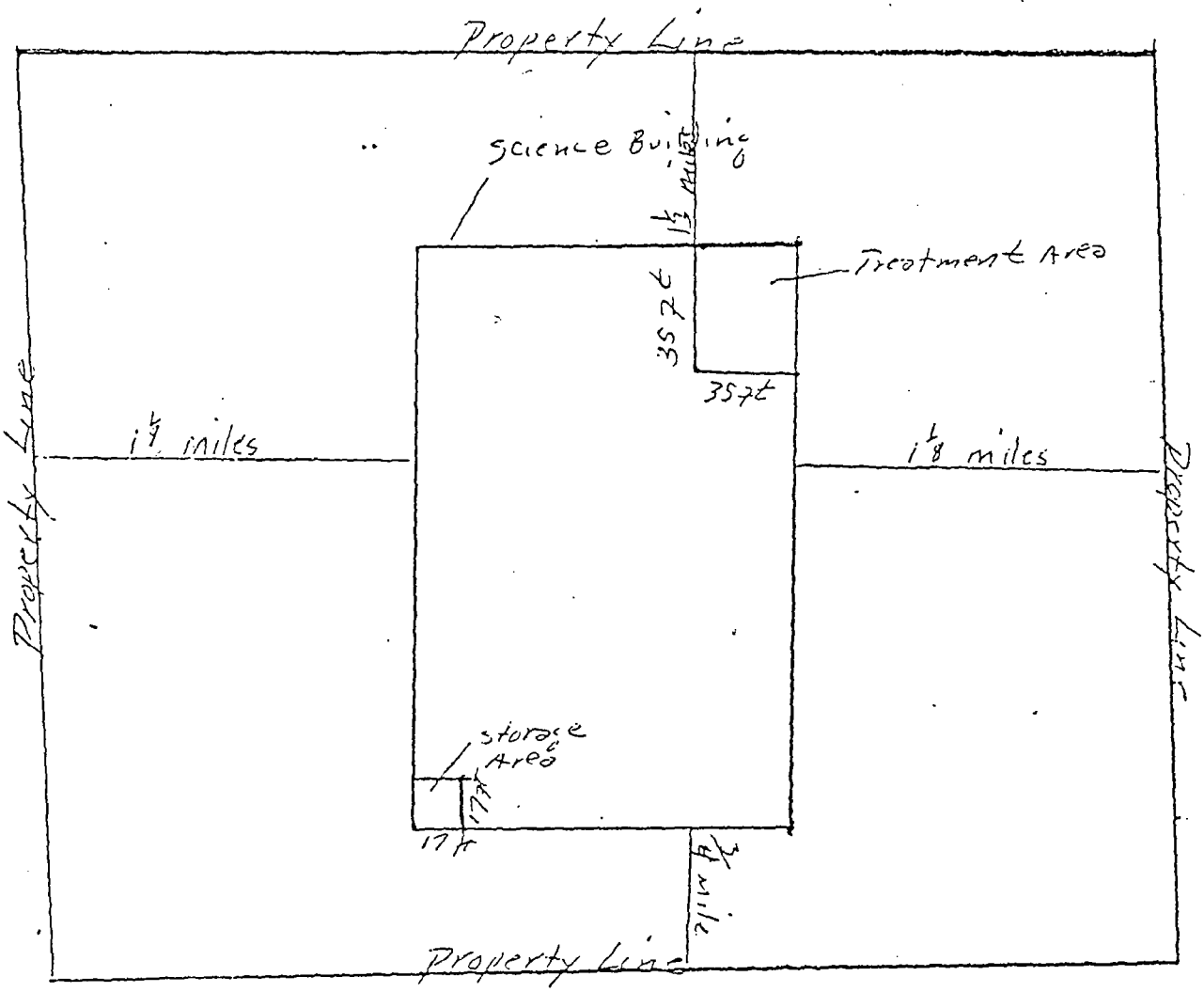
X. OPERATOR CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

A. NAME (print or type)	B. SIGNATURE	C. DATE SIGNED
Emil F. Jason	Emil Jason	3/23/87

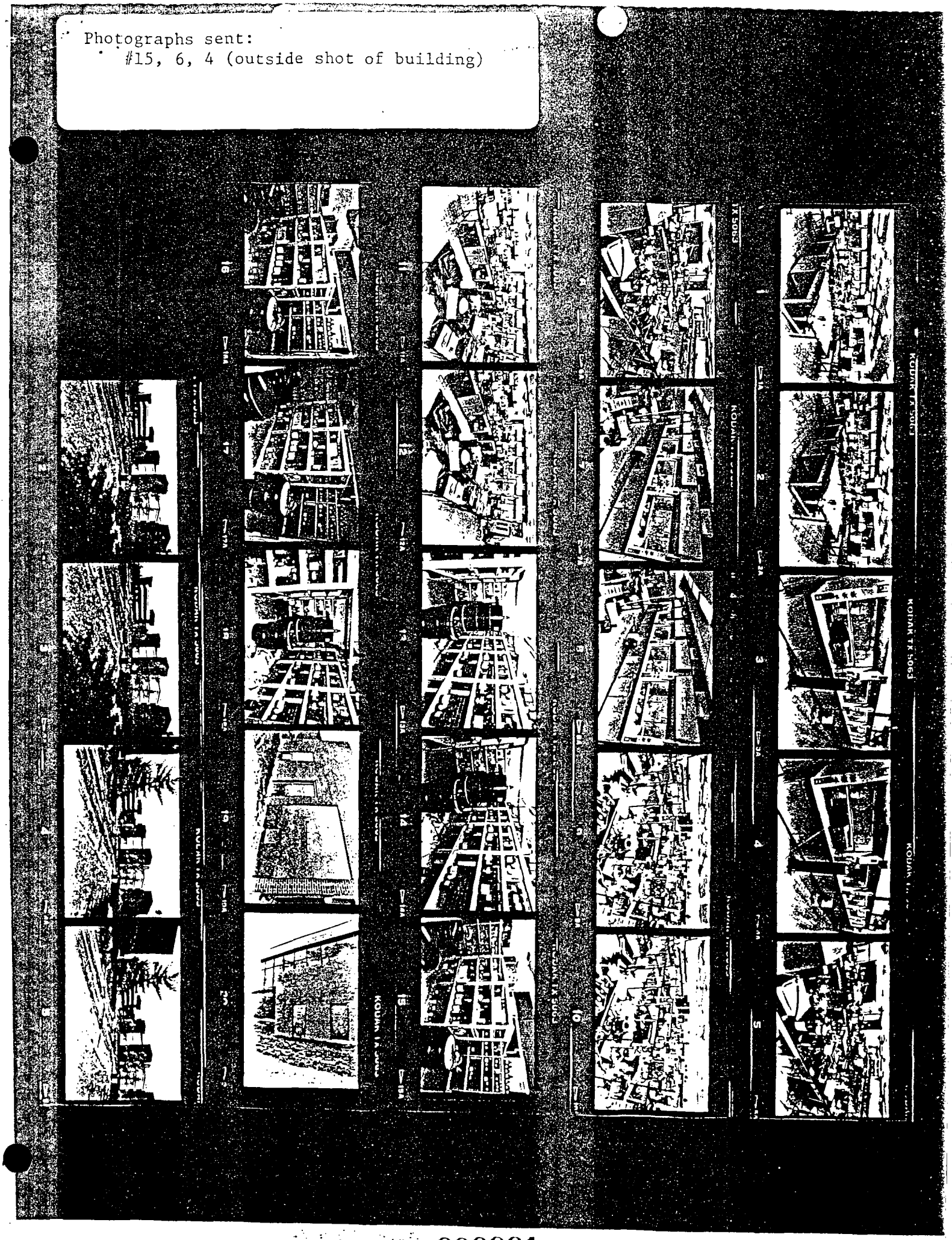
V. FACILITY DRAWING (see page 4)

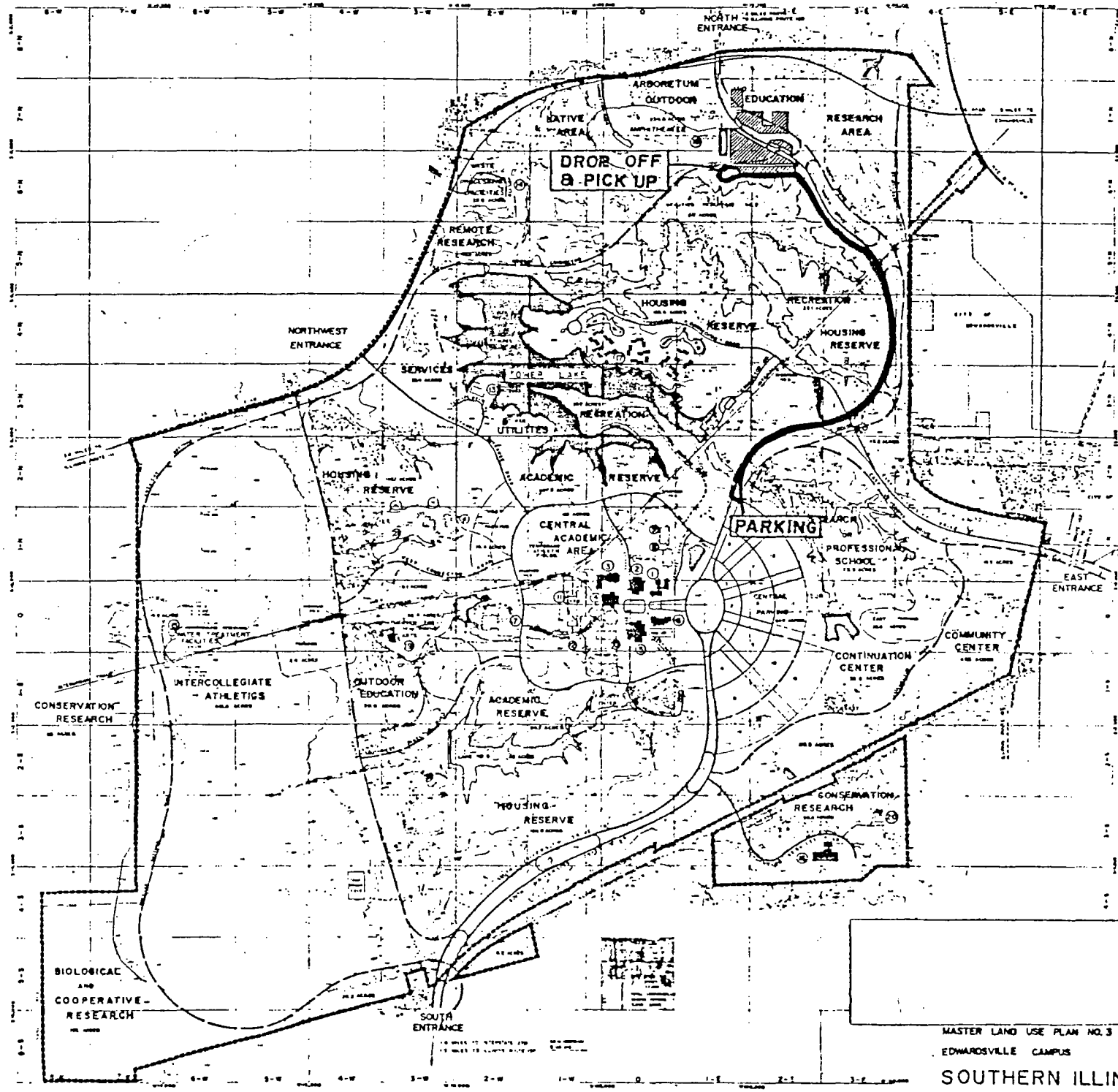
Facility drawing:



000060

Photographs sent:
#15, 6, 4 (outside shot of building)





LEGEND

1. JOHN MASON PECK CLASSROOM BLDG.-NO.
2. ELIJAH P LOVEJOY MEMORIAL LIBRARY
3. SCIENCE BUILDING
4. COMMUNICATIONS BUILDING
5. UNIVERSITY CENTER
6. GENERAL OFFICES BUILDING
7. PHYSICAL EDUCATION BUILDING
8. GENERAL CLASSROOM BUILDING - NO. 2
9. GENERAL CLASSROOM BUILDING - NO. 3
10. FINE ARTS BUILDING
11. PARKING STRUCTURE - NO. 1
12. RELIGIOUS CENTER
13. HEATING AND REFRIGERATION PLANT
14. WASTE PROCESSING PLANT
15. WATER TREATMENT FACILITIES
16. SUPPORTING SERVICES BUILDING
17. TOWER LAKE APARTMENTS
18. AMPHITHEATER
19. PERFORMING ARTS AMPHITHEATER
20. BROADCASTING FACILITIES
21. SINGLE STUDENT HOUSING

290000

AREA COLOR KEY

RED	ACADEMIC
ORANGE	HOUSING
DARK GREY	RESEARCH & BUFFER
LT. BLUE	LAKES
BROWN	UTILITIES & SERVICES
YELLOW	PUBLIC PARTICIPATION
GREEN	RECREATION
BLACK	INTERURBAN TRACK
DARK BLUE	EXISTING PERMANENT BLDG.
LT. GREY	PARKING
NO COLOR	PROPOSED CONSTRUCTION
YELLOW & BLUE	BLDGS. UNDER CONST.

MASTER LAND USE PLAN NO. 3

EDWARDSVILLE CAMPUS

SOUTHERN ILLINOIS UNIVERSITY

EDWARDSVILLE, ILLINOIS

UNIVERSITY ARCHITECT

NORTH

campus map

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6 Communications Building
14 Counselor Education Faculty Offices
71 Day Care Center
72 Delinquency Study Center (153, 154)
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73 Diagnostic Center, Special Education
13 Faculty Center
9 Fine Arts Faculty
11 Fleet Fueling Facility
18 General Classroom Building No. 2
19 General Classroom Building No. 3
4 General Office Building
7 Heating and Refrigeration Plant
12 Information Booth (X-13, X-14)
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11 Legal Counsel
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129 Quonset Theater
168 Recreation Program
14 Religious Center
160 St. Louis Metropolitan Area Airport Authority
3 Science Laboratory Building
115 Security Office
131 Senior Vice President for Planning & Review
X 8 Shower, Locker, and Aid Station
131 SIUE Foundation
X-2 Soccer Field
X-9 Soccer Field Parking Area
114 Social Sciences Faculty Offices
125 Special Education Center
128 String Development Program
11 Supporting Services Building
180 Tosovsky Center
401 Tower Lake Apartments (401-431)
X 4 Tower Lake Beach
X 5 Tower Lake Beach Parking Area
X-7 Track and Field Area
5 University Center
129 University Graphics and Publications
154 Veterans Talent Search/Upward Bound
8 Waste Treatment Plant
12 [redacted] Tower
20 [redacted] oadcasting Facilities

A Special Registered Vehicles
B University Center--Attended Pay Lot
C General Office Building--Metered Lot
D Special Registered Vehicles
E Special Registered Vehicles
P1, P2, P3 Registered Vehicles for Faculty and Staff
P4 to P13 Registered Vehicles for Faculty, Staff, and Students
P14 Registered Vehicles for Faculty, Staff, and Students

GREEN - Special Registered Vehicles

BLUE - Registered Vehicles for Faculty and Staff

RED - Registered Vehicles for Faculty, Staff and Students

NO COLOR CODE - Metered or Attended Pay Lot

M E M O R A N D U M

DATE: February 9, 1987

TO: Division File

FROM: Mike MDG Grant

SUBJECT: 1190255002 - Madison County - Edwardsville/SIU-E - Science Building
ILD # Applied For
~~RCRA~~ - FOS

On February 4, 1987, an ISS inspection was conducted at the University by Pat McCarthy and myself. Upon arrival, we met with Dr. Emil Jason, Chairman of the Chemistry Department, and Dirk Reif, Graduate Assistant. A Pre-Enforcement Conference was held with the subject facility on November 20, 1986. The facility was asked to submit waste determinations pursuant to 722.111 for the waste generated by the campus. On January 16, 1987, I received that submittal and resolved the violation.

As a result of this inspection, it was determined that there are two regulated facilities at the University. (See Attachment 1). Today's inspection only covered the activities at the Science Building. The activities at the Physical Plant were discussed, but a complete inspection was not conducted. Per the USEPA policy (Attachment 1), "where University campuses are divided by city streets, each section of the campus is considered a separate generator or small quantity generator." Therefore, only two of the campuses' sections are regulated. The hazardous waste generated by each of the other sections is less than 100 kg a month (conditionally exempt small quantity generator). The Physical Plant and the Science Building are generators of between 100 kgs and 1000 kgs. The Science Building is also regulated as a storage and treatment facility.

The Physical Plant generates approximately 60-70 gallons a month of solvent wastes. The generating points are the paint shop, office machine repair, and the print shop. These solvent wastes are taken to the Science Building where they are recycled and the reclaimed solvent is returned to the user. The recycling activities will be discussed later. Since it was determined that the Physical Plant is a separate facility, an inspection will be conducted to determine compliance with the Small Quantity Generator requirements. It should be noted that it was not determined that the Physical Plant was a separate regulated facility until after the ISS inspection and conversations with other Agency personnel.

The activities conducted at the Science Building are storage and treatment. This facility generates less than 1000 kgs a month and treats this waste on-site. Pursuant to 703.150(a)(3), generators of less than 1000 kgs per month, have until March 24, 1987 to file a Part A application, to be eligible for interim status. The facility's storage activities are a result of the recycling of the spent solvents from the Physical Plant. Since it was determined that the Physical Plant is an off-site facility, any length of time

the spent solvents are stored at the Science Building prior to recycling constitutes storage, pursuant to 721.106(c)(1). Although the Part A violation does not exist for the treatment of the waste generated by the Science Building, the storage of the spent solvents from the Physical Plant does constitute a violation. It should be noted that the spent solvents are usually stored less than a week before they are recycled. Other apparent violations also exist as a result of waste being taken from the Physical Plant to the Science Building, i.e., manifesting and obtaining a USEPA number. A map of the University is also attached, (Attachment 2) to show the two separate facilities.

The Science Building is establishing a program to handle the University's hazardous wastes. The wastes generated in the teaching labs are being treated. The solvent generated by the labs and the solvents received from the Physical Plant are reclaimed in one of two stills. Treatment of the lab wastes and distillation of the solvent, occurs in a lab specifically designated for this use. Treatment occurs in various size bottles and by various methods, i.e., reduction of chromium, neutralization, precipitation of metals. Logs are maintained which track the lab wastes from generation to treatment. Each bottle is given a unique number. Since the wastes are generated by the lab experiments in the classroom, the exact constituents of the wastes are known. This information is also available by cross-referencing the information maintained in the logs to the lab experiment instructions.

Several other wastestreams are generated, such as photographic waste and research lab wastes. These wastestreams are discharged to the facility's on-site NPDES permitted wastewater treatment plant. This method of waste handling is currently not being regulated by RCRA, but by the NPDES permitting program.

Since the University is a treatment and storage facility, the requirements of 722.134(d) are superseded by the 725 requirements, i.e., 180 days accumulation time and Subpart C of 725. The facility has already established a Contingency Plan, however, copies have not been sent to the local authorities. Although the training program has not been developed, it is scheduled for completion and implementation sometime in March. The facility's operating record is adequate for the treatment activities conducted, however, it needs to be amended to include the solvent waste accepted from the Physical Plant. A detailed waste analysis was not available for the spent solvent from the Physical Plant. The waste received from the Physical Plant is being accepted without a manifest. Additionally, no inspection records pursuant to 725.115 were presented. A closure plan and cost estimates have not yet been completed. The following violations will be alleged in a Pre-Enforcement Conference Letter:

1. 703.121
2. 703.150
3. 725.113
4. 725.115
5. 725.116
6. 725.137
7. 725.153
8. 725.173
9. 725.176
10. 725.212
11. 725.242
12. 725.274
13. 725.503

Since the same administration is in charge of the Physical Plant, a second Pre-Enforcement Conference Letter will be sent for that facility. The Pre-Enforcement Conference will allow us to explain the requirements which will apply to the Physical Plant, i.e., manifesting and notification, in relationship to the Science Building.

MDG:cas/0051L
Attachments

cc: DLPC - Collinsville
cc: USEPA - Region V
cc: Enforcement - Bruce Carlson
cc: Glenn Savage

DOC: 9451.02(83)
Madison-5IU-E

Key Words: EPA I.D. Numbers, Small Quantity Generators

Regulations: 40 CFR 261.33(e), 260.10, 264.149

Subject: Assignment of Generator I.D. Numbers to Colleges and Universities

Addressee: N/A

Originator: Carolyn Barley, Project Officer, OSW, and Barbara Hostage, Project Officer, OER - RCRA Hotline Monthly Status Report-September 1983

Source Doc: See Miscellaneous [9560.11(83) Question #9]

Date: 10-19-83

Summary:

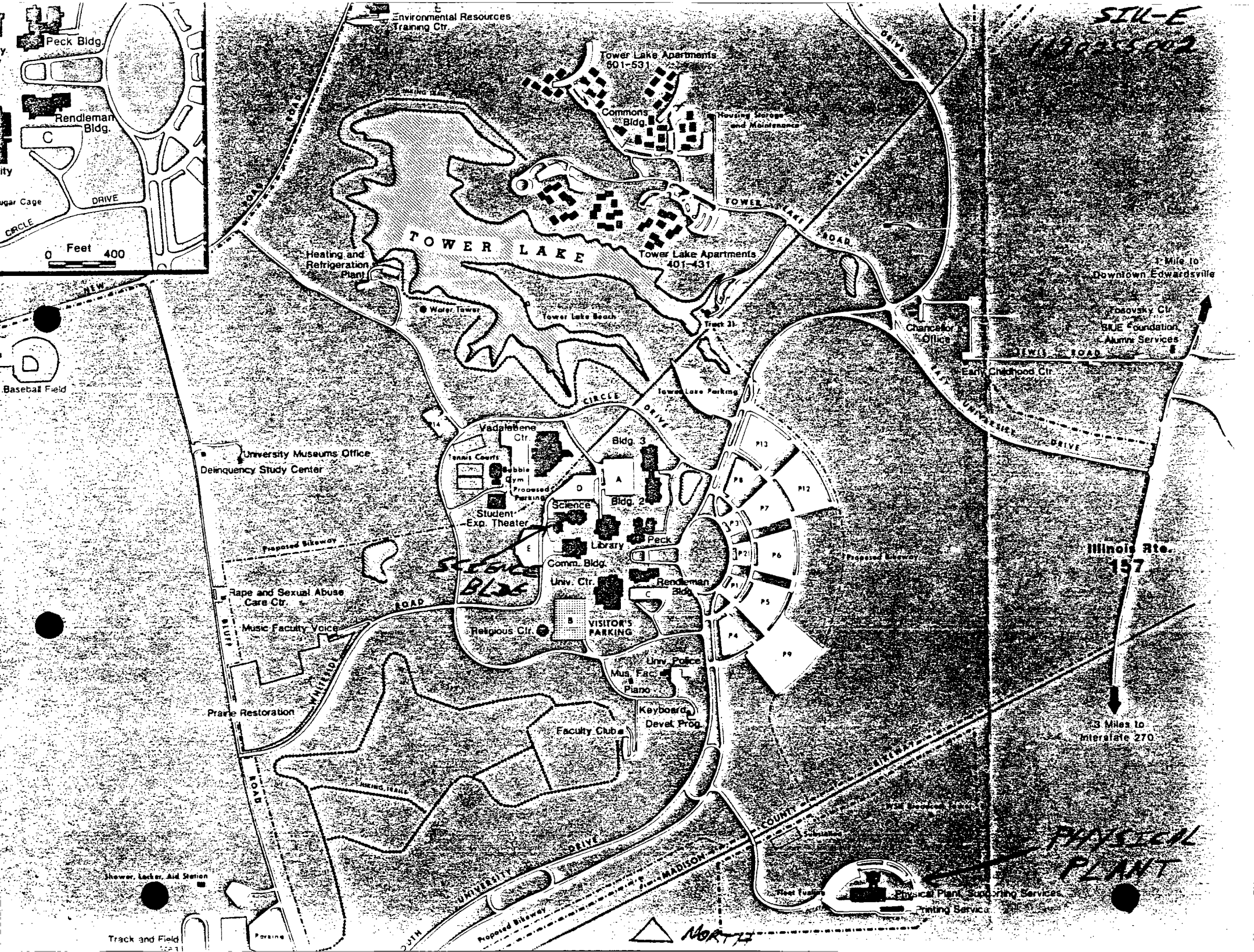
In assigning generator I.D. numbers to colleges and universities, the following configurations should be kept in mind:

a. A campus with several buildings on one contiguous piece of property would be considered a single or individual generation site even if one or more hazardous wastes are generated from one or more sources. One EPA I.D. number would be assigned. Small quantity generator status would be determined by the total hazardous waste generated or accumulated on the site.

b. Where university campuses are divided by city streets, each city block or section of the campus divided is considered a separate generator or small quantity generator. Each section would be given its own EPA I.D. number.

c. Where hazardous wastes are shipped from one building to another building, and the buildings are divided by a highway, a manifest would be needed while on the highway. The one exception is when the waste is shipped directly across the road. In this case, the receiving building is considered "on site," as defined in §260.10 even though both sites must have separate EPA I.D. numbers. The purpose here is to identify each shipment of hazardous waste as being from a specific location. EPA needs to identify who is responsible for the waste.

Taken from "RCRA Permit Policy Compendium: Summaries"


SIL-E
Environmental Resources Training Ctr.
Tower Lake Apartments 501-531
Commons Bldg.
Housing Storage and Maintenance
TOWER LAKE
Tower Lake Apartments 401-431
Heating and Refrigeration Plant
Water Tower
Tower Lake Beach
Tract 31
Chancellor's Office
1 Mile to Downtown Edwardsville
Early Childhood Ctr.
Tower Lake Parking
Vadalabene Ctr.
Bldg. 3
Bldg. 2
Tennis Courts
Bubble Gym
Proposed Parking
University Museums Office
Delinquency Study Center
Science
Student Exp. Theater
Library
Peck
Comm. Bldg.
Univ. Ctr.
Rendleman Bldg.
VISITOR'S PARKING
Religious Ctr.
Rape and Sexual Abuse Care Ctr.
Music Faculty Voice
Univ. Police
Mus. Fac. Piano
Keyboard Devel. Prog.
Faculty Club
Prairie Restoration
Shower, Locker, Aid Station
Track and Field
Baseball Field
Peck Bldg.
Rendleman Bldg.
C
DRIVE
CIRCLE
Feet
0
400
Illinois Rte. 157
3 Miles to Interstate 270
PHYSICAL PLANT
Physical Plant Supporting Services
Printing Service
NORTH

M E M O R A N D U M

DATE: [redacted]86

TO: [redacted] File

FROM: Mike Grant MDG

SUBJECT: 1190255002 - Madison County - Edwardsville/SIU-E
Non-Notifier
RCRA-FOS

On December 2, 1986 Pat McCarthy and myself met with Dr. Emil Jason, Chairman of the Chemistry Department at the facility. The purpose of our visit was to discuss the alternatives the University has as to the handling of their wastes. As discussed in the memo dated November 21, 1986, the facility may elect to treat some of their lab wastes which would result in the facility being classified as a TSD and subject to the RCRA permitting requirements. The facility is also a POTW and eligible for a Part B "permit by rule" pursuant to Section 703.141 (c).

We discussed these options with Dr. Jason. He said he felt using the wastewater treatment plant and receiving a permit by rule was probably the best administrative route for them. It was discussed that the NPDES permit may have to be amended to reflect parameters of the hazardous wastes which would be discharged. He agreed that this would be essential. We also told him that any treatment done to the wastes prior to being discharged would be subject to the TSD requirements. He provided a scenario that the lab solutions may not necessarily be classified as wastes. Students of the University conduct experiments such as reducing hexavalent chromium to trivalent chromium and thus the solutions remain valuable as an educational tool. It is still premature to classify the facility as a TSD, however, at a minimum they are a generator. Dr. Jason said that he would have to meet with the wastewater treatment plant operator to discuss the ramifications of having the NPDES permit amended if the University elects to discharge the wastes to the sewer. Also it would have to be discussed with Administration whether or not they elect to apply for a TSD permit.

After these discussions, we toured the accumulation building where off-specification chemicals are held. Currently SIU-E is awaiting bids from contractors to remove approximately three to four 55 gallon drums of these chemicals. The lab where spent solvent is recovered was also observed. A still has been constructed which reclaims five liters at a time. There were two gallon glass jugs to be reclaimed and approximately five gallon jugs of solvent which had been already reclaimed. All jugs were labelled as to their contents. Dr. Jason said the still had been operable for three months and that approximately two quarts of still bottoms have been generated. The still bottoms were being accumulated in a labelled five gallon container in the lab.

A new date for submittal of the commitment letter reflecting the November 20, 1986 pre-enforcement conference was scheduled. It is to be received by December 16, 1986. The letter will contain the following information:

1. The position the University takes as to being classified as a TSD, a POTW or a combination of both.

2. Submittal of the contingency plan. The draft was observed during today's visit, but not reviewed for content or adequacy.

3. The commitment date of January 19, 1987 to make a waste determination of all solid waste generated on campus.

4. Training of employees or students which handle hazardous waste to be completed by the first week of March.

5. Submittal of the 8700-12 classifying the University as a generator in order to at least receive an ILD #. A copy of the 8700-12 is to be attached to the letter.

Upon receipt and review of the letter, a determination will be made as to the facility's classification.

MDG:cas/0270L

cc: DLPC - Collinsville
cc: Bruce Carlson - Enforcement ✓
cc: Bur Filson

SIUE Southern Illinois University at Edwardsville

Office of the Vice President for Administration

December 16, 1986

Mr. Bruce Carlson
Enforcement Program
2200 Churchill Road
Springfield, Illinois 62702

Dear Mr. Carlson:

This communication summarizes the actions the University was directed to take as a result of the November 20 and December 2, 1986, meetings with you and other EPA representatives.

November 20 Meeting

1. The University should apply for a US-EPA Identification Number.

   The University has applied for the US-EPA I.D. Number as a Small Quantity Generator as of December 8, 1986.

2. The University should develop a Contingency Plan and Emergency Procedures for its facility. These should be forwarded to Mike Grant at the Collinsville office by December 15. These are now in the draft stage and should be ready by December 19.

3. The University should conduct a Personnel Training Program sometime in March, 1987.

4. The University should identify its waste streams and the amounts by January 19. These should be forwarded to Mike Grant.

December 2 Meeting

The December meeting focused on the University's current treatment facilities. A discussion of the possible routes the University could take to obtain a Treatment Permit took place. One possible route involved the Permits by Rule under Section 703.141, Subpart C of 35 Illinois Adm. Code since the University operates a publicly owned treatment works. The University was informed of the need to modify its Waste Treatment Facility Permit should this route be followed.

Rm. 2228, Rendleman Building, Edwardsville, Illinois 62026-1158 (618) 692-2536

A second route centered on applying for a TSD Permit under Subparts A and B of 35 Illinois Adm. Code 724. The University has elected to pursue this route and requests that you forward the necessary forms in order that we can start the application process.

Sincerely,

Earl Beard

Earl Beard
Vice President for Administration

cc: Mike Grant
Emil Jason
P.M. McCarthy

217/782-6761

Refer to: 1190255002 — Madison County
Edwardsville/SIU-Edwardsville
Non-Filer
Compliance File

PRE-ENFORCEMENT CONFERENCE LETTER

Certified # P594 526 580

November 3, 1986

Southern Illinois University at Edwardsville
Attn: Earl E. Lazerson, President
P.O. Box 1151
Edwardsville, Illinois 62026

Dear Mr. Lazerson:

The Agency has previously informed Southern Illinois University at Edwardsville of apparent violations of the Illinois Environmental Protection Act and/or rules and regulations adopted thereunder. These apparent violations are set forth in Attachment A of this letter.

As a result of these apparent violations, it is our intent to refer this matter to the Agency's legal staff for the preparation of a formal enforcement case. The Agency's legal staff will, in turn, refer this matter to the Office of Attorney General or to the United States Environmental Protection Agency for the filing of a formal complaint.

Prior to taking such action, however, you are requested to attend a Pre-Enforcement Conference to be held at the Illinois Environmental Protection Agency, Collinsville Regional Office, 2009 Mall Street, Collinsville, Illinois 62234. The purpose of this Conference will be:

1. To discuss the validity of the apparent violations noted by Agency staff, and

2. To arrive at a program to eliminate existing and/or future violations.

You should, therefore, bring such personnel and records to the conference as will enable a complete discussion of the above items. We have scheduled the Conference for November 20, 1986, at 10:30 a.m. If this arrangement is inconvenient, please contact Mike Grant at 618/346-4000 to arrange for an alternative date and time.

In addition, please be advised that this letter constitutes the notice required by Section 31(d) of the Illinois Environmental Protection Act prior to the filing of a formal complaint. The cited Section of the Illinois Environmental Protection Act requires the Agency to inform you of the charges which are to be alleged and offer you the opportunity to meet with appropriate officials within thirty days of this notice date in an effort to resolve such conflict which could lead to the filing of formal action.

Sincerely,

Michael F. Nechvatal, Manager
Compliance Monitoring Section
Division of Land Pollution Control

MFN:BF:jd/0446g/32-33

Attachment

cc: Division File
Southern Region
Bruce Carlson
Dave Grant
Dan Olson

Attachment A

1. Pursuant to 35 Ill. Adm. Code 722.111, a person who generates a solid waste as defined in Section 721.102, must determine if that waste is a hazardous waste using the following method:

   a. He should first determine if the waste is excluded from regulation under Section 721.104.

   b. He must then determine if the waste is listed as a hazardous waste in Subpart D of Part 721.

   Note: Even if a waste is listed, the generator still has an opportunity under Section 720.122 and 40 CFR Section 260.22 to demonstrate that the waste from his particular facility or operation is not a hazardous waste.

   c. If the waste is not listed as a hazardous waste in Subpart D of Part 721, he must determine whether the waste is identified in Subpart C of Part 721 by either:

      1. Testing the waste according to the methods set forth in Subpart C of Part 721, or according to an equivalent method approved by the Board under Section 720.120; or

      2. Applying knowledge of the hazard characteristic of the waste in light of the materials or the processes used.

   You are in apparent violation of this Section for the following reason: Failure to comply with the requirements of this Section for the following wastestreams;

   1. Waste generated in the photography labs.

   2. Solvent wastes generated at the facility; i.e. from the paint shop, the print shop, the office machine repair shop and the auto shop.

   3. All lab wastes generated at the campus.

   4. The sludge generated at the wastewater treatment plant.

   In addition to these known wastestreams, any solid wastes generated at the campus must also be analyzed to determine whether or not it is hazardous. Upon determination that a solid waste is a hazardous waste, it must be handled to meet the requirements of Sections 722 through 726. This includes the shipping of such waste off-site to a permitted treatment or disposal facility.

2. Pursuant to Section 21(e) of the Illinois Environmental Protection Act, "No person shall dispose, treat, store or abandon any waste except at a site or facility which meets the requirements of this Act and of regulations and standards thereunder."

MDG:jlr/0140L

JUN 0 8 1990

5HR-12

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Anthony Wilbraham, Ph.D
Professor of Chemistry
Southern Illinois University (Edwardsville)
P.O. Box 1652
Edwardsville, Illinois 62026

Re: Notice of Violation
Southern Illinois University
(Edwardsville)
ILD 006 331 342

Dear Dr. Wilbraham:

On February 14, 1990, an inspection of Southern Illinois University (Edwardsville) was conducted by representatives of the United States Environmental Protection Agency (U.S. EPA). Under Section 3007 of the Resource Conservation and Recovery Act (RCRA), Federal Agencies have been granted the primary responsibility for ensuring the compliance of State facilities under their jurisdiction.

The purpose of the inspection was to determine if Southern Illinois University (Edwardsville) was in compliance with the State equivalent requirements of Subtitle C of RCRA as amended, 42 U.S.C. §6901 et seq. The State requirements are found at 35 Ill. Adm. Code Part 720 et seq. In addition, a land ban inspection was conducted. The purpose of this portion of the inspection was to determine the compliance status of your facility with respect to the land disposal restrictions for F001-F005 spent solvents which became effective on November 8, 1987, (40 CFR Part 268, and revisions to 40 CFR Parts 260-265 and 270-271); for "California List" hazardous wastes on July 8, 1987, (52 Federal Register 25760: revisions to 40 CFR Parts 262, 264, 265, 268, and 270-271), for First Third hazardous wastes on August 8, 1988, (53 Federal Register 31138: revisions to 40 CFR Parts 264, 265, 266, 268, and 271); and for Second Third hazardous wastes on June 9, 1989, (40 CFR Part 268 revisions to 40 CFR Parts 260-265 and 270-271). A copy of the inspection reports are enclosed for your information.

As a result of the inspection, it was determined that Southern Illinois University (Edwardsville) appears to be in compliance with the land disposal restrictions portion; however, as a result of the RCRA inspection, the following violations have been identified:

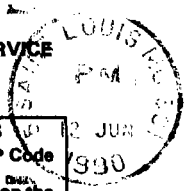
UNITED STATES POSTAL SERVICE

OFFICIAL BUSINESS

SENDER INSTRUCTIONS

Print your name, address and ZIP Code in the space below.

- Complete items 1, 2, 3, and 4 on the reverse.
- Attach to front of article if space permits, otherwise affix to back of article.
- Endorse article "Return Receipt Requested" adjacent to number.



PENALTY FOR PRIVATE USE, $300

RETURN TO

Print Sender's name, address, and ZIP Code in the space below.

Barbara Russell (5HR-10)

U.S. EPA

230 S. Dearborn, Chicago, IL 60604

SENDER: Complete items 1 and 2 when additional services are desired, and complete items 3 and 4.

Put your address in the "RETURN TO" Space on the reverse side. Failure to do this will prevent this card from being returned to you. The return receipt fee will provide you the name of the person delivered to and the date of delivery. For additional fees the following services are available. Consult postmaster for fees and check box(es) for additional service(s) requested.

1. ☑ Show to whom delivered, date, and addressee's address. *(Extra charge)*
2. ☐ Restricted Delivery *(Extra charge)*

3. Article Addressed to:

ANTHONY Wilbraham, Ph.D.
Professor of Chemistry
Southern Illinois University (Edwardsville)
P.O. Box 1652
Edwardsville, Illinois 62026

4. Article Number

P 155 069 676

Type of Service:

- ☐ Registered
- ☒ Certified
- ☐ Express Mail
- ☐ Insured
- ☐ COD
- ☐ Return Receipt for Merchandise

Always obtain signature of addressee or agent and DATE DELIVERED.

5. Signature — Address

X

6. Signature — Agent

X W Jones

7. Date of Delivery

6/12/90

8. Addressee's Address *(ONLY if requested and fee paid)*

PS Form **3811**, Mar. 1988 * U.S.G.P.O. 1988-212-865 **DOMESTIC RETURN RECEIPT**

STICK POSTAGE STAMPS TO ARTICLE TO COVER FIRST CLASS POSTAGE, CERTIFIED MAIL FEE, AND CHARGES FOR ANY SELECTED OPTIONAL SERVICES. (See front)

1. If you want this receipt postmarked, stick the gummed stub to the right of the return address leaving the receipt attached and present the article at a post office service window or hand it to your rural carrier (no extra charge)

2. If you do not want this receipt postmarked, stick the gummed stub to the right of the return address of the article, date, detach and retain the receipt, and mail the article

3. If you want a return receipt, write the certified mail number and your name and address on a return receipt card, Form 3811, and attach it to the front of the article by means of the gummed ends if space permits. Otherwise, affix to back of article. Endorse front of article **RETURN RECEIPT REQUESTED** adjacent to the number

4. If you want delivery restricted to the addressee, or to an authorized agent of the addressee, endorse **RESTRICTED DELIVERY** on the front of the article.

5. Enter fees for the services requested in the appropriate spaces on the front of this receipt. If return receipt is requested, check the applicable blocks in item 1 of Form 3811

6. Save this receipt and present it if you make inquiry.

U.S.G.P.O. 1988-217-132

Barbara Russell (STR-12)

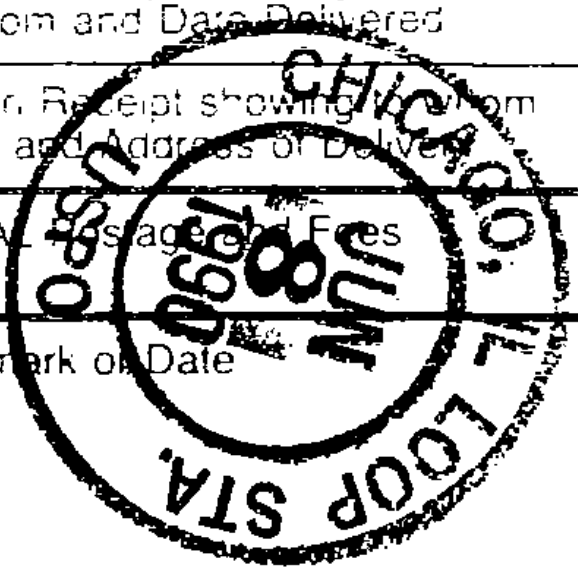
P 155 069 676

RECEIPT FOR CERTIFIED MAIL

NO INSURANCE COVERAGE PROVIDED
NOT FOR INTERNATIONAL MAIL

(See Reverse)

Sent to ANTHONY Wilbraham, PhD	
Street and No. P.O. Box 1652	
P.O., State and ZIP Code Edwardsville, IL 62026	
Postage	$ 2.40
Certified Fee	
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt showing to whom and Date Delivered	
Return Receipt showing to whom Date and Address of Delivery	
TOTAL Postage and Fees	$
Postmark or Date	



PS Form 3800, June 1985

1. Failure to maintain containers holding hazardous wastes in good condition as required by Section 275.271 i.e., a 5-gallon pail of waste labeled "nonhalogenated solvents only" was observed leaking on the floor of the treatment, storage, disposal room (approximately 1 to 2 gallons were released);

2. Failure to conduct and document weekly inspections of containers as required by Section 275.274 and failure to inspect the facility for malfunctions and deterioration, operating errors, and discharges as required by Section 275.115, i.e., during the last quarter of 1989 and the first 2 months of 1990, the weekly inspections were not documented for the RCRA storage room;

3. Failure to ensure that all personnel involved in the RCRA Management Program receive training as required by 725.116, i.e., it was noted that two assistants, Mr. Sharangpani and Mr. Trilokeker had not completed RCRA training;

4. Failure to store all containers holding hazardous waste closed as required by Section 725.273, i.e., it was noted that in several chemistry labs, many open containers were accumulating hazardous waste within ventilation hoods; and

5. Failure to identify contents and mark dates on all containers entering storage as required by 722.134, i.e., it was noted that several labs had numerous 5-gallon pails of hazardous wastes which were not labeled nor had the accumulation dates marked on them. Several labs had several pails of wastes indicating that the pails may have been accumulating hazardous waste for many months.

A follow-up inspection was conducted on March 8, 1990. During this inspection, it was noted that violation #3 appeared to be adequately addressed; however, violations #1, #2, #4, and #5 remain outstanding. Further, it was noted that the university was unable to complete the 1989 facility and generator activity hazardous wastes reports and that a letter was submitted to the Illinois Environmental Protection Agency (IEPA) requesting a two week extension. At this time U.S. EPA will not cite this as a violation; however, U.S. EPA is requesting documentation indicating that the reports have been submitted.

You are hereby requested to submit within (30) days from the date of this letter a written description of actions taken to correct the aforementioned violations and to indicate what measures have been initiated to assure future compliance. Failure to correct the violations may subject the facility to further Federal enforcement action.

If you have any questions, please feel to contact Ms. Barbara Russell of my staff at (312) 353-7922.

Sincerely yours,

William E. Muno, Chief
RCRA Enforcement Branch

Enclosure

cc: Harry Chappel, IEPA-CMS
Glenn Savage, IEPA-FOS
Emil Jason PhD., Chairperson, SIU

5HR-12:B.RUSSELL:ev:5/17/90:FILENAME:wilbraham

EV 5-24-90

RCRA ENFORCEMENT				
INIT. DATE	BR 5/24/90	PLD 5-24-90	6/7/90	6/4/90

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION V

DATE: MAR 27 1990

SUBJECT: RCRA Inspection at Southern Illinois University, Edwardsville, Illinois (ILD006331342) (AGD102:09)

FROM: Gerald R. Golubski, Environmental Engineer
Central District Office (5SCDO)

TO: William E. Muno, Chief
RCRA Enforcement Branch (5HE)

THRU: Willie H. Harris, Chief
Central District Office (5SCDO)

On February 14, 1990, a RCRA inspection was conducted at this State University. This inspection was pursuant to your office's request for inspections during FY'90. The facility was represented by Dr. Anthony Wilbraham, Professor of Chemistry who serves on a part time basis as the manager of the hazardous waste program on campus. Also, representing the University at the time of this inspection was Dr. Emil Jason, Chairperson for the Department of Chemistry.

The Illinois EPA (Collinsville Office) was notified that an inspection was to have taken place at this time, however, they did not participate.

Background

Hazardous wastes are generated either on campus or at the University's Physical Plant Building. The Physical Plant Building is located on the east side of the campus and serves the University by providing a paint shop, automobile repair shop, electrical and plumbing maintenance area. In addition, the physical plant use to provide a typewriter cleaning service, however, this practice has been discontinued. Currently, all typewriters are picked up on campus and cleaned by an outside vendor. The University no longer generates cleaning solvents from this effort.

Typical wastes generated at the physical plant consists of used crankcase oils, hydraulic oils, used antifreeze (ethylene glycol) and paint thinners. The University has a special service contract with Ace Oil Service LTD, of Glencoe, Missouri (314) 458-1700. Ace Oil Service recycles the oils/fluids that are stored on an outside loading dock which is located on the east side of the physical plant building. Normally, Ace Oil Service pumps the half dozen 55 gallon barrels every two to three months. As explained by operating personnel only the liquids are removed. The barrels always remain on site.

In an effort to minimize paint shop wastes, the University has adopted whenever possible, a practice of using water soluble paints. Only on rare occasions are oil base paints utilized. When used these paints will of course be cleaned with paint thinners. As witnessed by this U.S. EPA inspector only one drum of waste paint thinner was stored in the paint shop area. The drum was approximately 2/3 filled, and had an appropriate hazardous waste label and was stored closed. The paint shop foreman was aware that in the event that the drum becomes filled, he has only three days to have it removed to the campus TSD storage room located in the basement of the chemistry building. The University, is also regulated as a transporter of hazardous waste. This was necessary since the campus is bisected by Illinois Highway 157.

Campus wastes are mostly generated from the undergraduate teaching laboratories. However, some minor amounts of wastes are generated from graduate research activities. After, each experiment is completed it is contained in a one gallon container which details the laboratory experiment, date and laboratory room number. Graduate students pick-up these wastes each week and deliver them to Dr. Wilbraham's student aides. These aides conduct routine conformational tests (fingerprint tests) and log the date, the amount of waste generated and how it is disposed. The aides follow a lab top text entitled "Prudent Practices for Disposal of Chemicals from Laboratories (1983)". Essentially, this book details various methodologies to reduce or neutralized various laboratory waste by either neutralization (of acids and basis) or destruction of various functional groups (such as cyanides). In the event of receiving a solvent (D001) it is immediately transferred into 5 gallon pails. These 5 gallon pails are separated into either halogenated or non halogenated dedicated pails. The pails are carried downstairs to the chemistry building's RCRA storage room. Here, these solvents are poured into 55 gallon drums. Ultimately, these drums are manifested off site for disposal.

February 14, 1990 Inspection

At the time of this U.S. EPA inspection, the following observations were made.

TSD Storage Room

A 5 gallon pail of waste entitled "non halogenated solvents only" was leaking on the floor of this room. It appears that approximately 1 to 2 gallons were released. The spill was being contained by absorbent material. However, it was evident that the spill initially began on a lower wooden shelve inside the storage room. A wet stain was clearly evident where this 5 gallon pail was initially placed. Although, the pail was still leaking at the time of this inspection, the leak was contained by the absorbent material (clay).

It is therefore recommended that:

1. The pail's contents be immediately placed into another pail.

2. The absorbent material be swept up off the floor and containerized.

3. The wooden shelve be removed, containerized and a new shelve installed.

Weekly Inspections

During the last quarter of 1989 and the first two months of this year, the weekly inspections were not documented for the RCRA storage room. These inspections need to be documented.

Annual Training

Currently, the University has a half-dozen students who operate the hazardous waste program under Dr. Wilbraham's direction. At the time of this inspection, two assistants had not completed RCRA Training (Mr. Sharangpani and Trilokeker). They should be RCRA trained before they are allowed to work alone.

Teaching Laboratories

Upon inspecting several chemistry labs it was observed that many open containers were accumulating hazardous waste within ventilation hoods. It appears that the students routinely leave these one gallon containers open and simply stick a funnel on top. Eventually, the solvents in the hood escape up through the ventilation system and exit the building. Since these gallon containers have hazardous wastes, they must be kept close at all times (unless wastes are being removed or placed inside).

Research Labs

Upon inspecting the research labs it was observed that again open containers were placed inside ventilation hoods. In addition, several labs had numerous 5 gallon pails of Hazardous Wastes which were not labeled or had accumulation dates. Moreover, several labs had several pails of wastes indicating that they may have been accumulating for many months. It is apparent that the University does not inspect these labs in a timely manner in order to minimize the actual amount of hazardous wastes from accumulating.

Safety Issues

Pursuant to this RCRA inspection various safety deficiencies were also revealed. In an effort to address these concerns the Chemistry Departments Safety Committee inspected these Labs one week later.

A detailed memorandum to Facility personnel expressing these concerns was submitted on February 23, 1990 (see attached memorandum). The memorandum also stated that a follow up inspection would be performed in the next two or three weeks.

March 8, 1990 Inspection

After completing a multi-media inspection at a nearby facility, a return inspection to the University was conducted on March 8, 1990. This inspection was re-scheduled in order to re-inspect the spill area inside the RCRA storage room.

At the time of the follow up inspection, the following significant observations were made.

Storage Room

The leaking 5 gallon pail was still present, however, its contents were apparently transferred. The floor area was swept and all absorbent materials were containerized. Finally, the lower shelve that had been stained was removed and a new shelve was installed.

RCRA Training

All the student aides who work for Dr. Wilbraham were receiving RCRA Training. A Hazardous Materials Instructor was completing classroom training at the time of this second inspection. The student aides also received training the previous day. One more day of RCRA Training (including the Use of Self Contain Breathing Apparatus) was scheduled for the following day.

Facility 1989 Hazardous Waste Activity Report

The University was unable to complete their 1989 Facility and Generator Activity hazardous waste reports. The deadline was February 28, 1990. Dr. Wilbraham on March 1, 1990 submitted a Letter to the Illinois EPA (see attachment) asking for a two week extension.

Laboratory Inspection

Again, a few labs had hazardous waste containers stored open inside ventilation hoods. However, it did appear that the University was making some progress in removing excess containers from the labs.

Manifests

The University routinely submits Land Ban notifications with their manifests (see attachment).

In summary, it appears that the University must re-dedicate itself to an effective Hazardous Waste Management program. At the present time only one part time faculty member (Dr. Wilbraham) is assigned the task of managing the entire program. It is evident that due to the complexity of operating the TSD storage area, the generation of wastes on campus and at the physical plant, the treatment of wastes by student aides, the transportation of wastes on campus, and the time necessary for the preparation of manifests and annual reports, greater University support appears warranted. It is recommended that further administrative support be provided in order to alleviate future deficiencies (violations) within their RCRA program.

Attached is a completed Illinois Hazardous Wastes Inspection Report form and Land Ban Disposal Restriction Report form.

If you have any questions regarding this inspection, please call me at 886-1968.

Attachments

2 8 AUG 1989

5HR-12

Antony Wilbraham, Ph.D
Professor of Chemistry
Southern Illinois University (Edwardsville)
P.O. Box 1652
Edwardsville, Illinois 62026

Re: Southern Illinois University
(Edwardsville)
ILD 006 331 342

Dear Dr. Wilbraham:

On May 10, 1989, an inspection of Southern Illinois University (Edwardsville) was conducted by representatives of the United States Environmental Protection Agency (U.S. EPA). Under Section 3007 of the Resource Conservation and Recovery Act (RCRA), Federal Agencies have been granted the primary responsibility for ensuring the compliance of State facilities under their jurisdiction.

The purpose of the inspection was to determine if Southern Illinois University (Edwardsville) was in compliance with the State equivalent requirements of Subtitle C of RCRA as amended, 42 U.S.C. §6901 et seq. The State requirements are found at 35 Ill. Adm. Code Part 720 et seq. In addition, a Land Ban inspection was conducted, however, a checklist was not completed. The purpose of this portion of the inspection was to determine the compliance status of your facility with respect to the land disposal restrictions. The land disposal restrictions for F001-F005 spent solvents became effective on November 8, 1987 (40 CFR Part 268, and revisions to 40 CFR Parts 260-265 and 270-271), for California List" hazardous wastes on July 8, 1987, (52 Federal Register 25760: revisions to 40 CFR Parts 262, 264, 265, 268, and 270-271), and for First Third of hazardous wastes on August 8, 1988, (53 Federal Register 31138: revisions to 40 CFR Parts 264, 265, 266, 268, and 271). A copy of the inspection report is enclosed for your information.

As a result of the inspection, it was determined that Southern Illinois University (Edwardsville) appears to be in compliance with the State requirements found at 35 Ill. Adm. Code Part 720 et seq. and the land disposal restrictions.

If you have any questions, please feel free to contact Ms. Barbara Russell of my staff at (312) 353-7922.

Sincerely yours,

William E. Muno, Chief
RCRA Enforcement Branch

Enclosure

cc: Harry Chappel, IEPA
Glenn Savage, IEPA

bcc: William Franz, ERB

B.RUSSELL:ev:08/23/89:disk 1: PC FILENAME:Wilbraham

E.V 8-25-89

RCRA ENFORCEMENT	REB STAFF	REB SECTION CHIEF	REB CHIEF
INIT.	BRB	R.E.D	WEM
DATE	8-25-89	8-25-89	8/28/89

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION V

DATE: 14 JUN 1989

SUBJECT: RCRA Inspection at Southern Illinois University
Edwardsville, Illinois (ILD006331342) (AGD102:24)

FROM: Gerald R. Golubski, Environmental Engineer GRG
Central District Office (5S CDO)

TO: William E. Muno, Chief
RCRA Enforcement Branch (5 HE)

THRU: Willie H. Harris, Chief WHH
Central District Office (5S CDO)

On May 10, 1989, a RCRA Inspection was conducted at this State University. This inspection is pursuant to your office's request for inspections during FY'89. The facility was represented by Dr. Anthony Wilbraham, Professor of Chemistry who manages the hazardous waste program on campus. The Illinois EPA (Collinsville office) was notified that an inspection was to have taken place at this time, however, they did not participate.

BACKGROUND

Hazardous wastes are generated on campus at either the physical plant building or within several teaching laboratories (chemistry, biology etc.). The physical plant generates mostly a few gallons each month of waste paint solvents. These solvents are manifested to the chemistry buildings RCRA storage room. In addition, a small amount of cleaning solvents (10-15 gallons/ month) that are used to clean typewriters is distilled in the chemistry building. The pure distillate is reused. Any residues are manifested for disposal off site.

The identity of the hazardous wastes solvents from the teaching laboratories are well known. Copies of each experiment detailing the type of organic compounds used is provided to Dr. Wilbraham. Once the experiments are completed, the labeled bottles with the experiment number are immediately given to students who work for Dr. Wilbraham. These students have completed chemistry classes and are knowledgeable in performing routine "fingerprint testing". Each waste bottle is logged, tested and placed in the chemistry buildings TSD RCRA storage room.

At the time of this inspection, the following observations were made:

TSD STORAGE ROOM

Weekly inspections are well documented. Dates, times, items to be checked and appropriate signatures were affixed. There appeared to be ample storage capacity inside the room. Shelves were clean. Bottles were labeled and stored closed.

ANNUAL TRAINING

Annual Training of the students who participate in the RCRA program are well documented. These records contain dates, description of training, individuals trained in the past as well as students who are currently employed by the university. Job descriptions are on file and appear to be complete.

RCRA GENERATION

According to the facilities 1988 Annual Report, the following hazardous wastes were shipped to Nuclear Sources and Services, Inc., Houston Texas. (TXD055135388)

825 gallons of D001 wastes.
295 gallons of D002 wastes.
96 gallons of D003 wastes.
5 gallons of formaldehyde solution (U122).

RCRA STORAGE

Upon reviewing the facility's annual RCRA TSD Report, it appears that the facility mostly generated ignitable (D001), corrosive (D002), and reactive wastes (D003). Some heavy metals are in storage (less than 15 gallons) as well as a few F001 through F005 (less than 15 gallons). In addition, the annual report listed very minor quantities of RCRA Land Ban First Third Wastes (less than 5 gallons) that were in storage. Since these are "negligible quantities" the Land Ban check list was not completed.

Last Years U.S. EPA Inspection (May 27, 1988)

Several deficiencies were noted in last years inspection report. However, it appears that these deficiencies have been corrected. Namely.

1. The 1987 annual report was completed and filed with the Illinois EPA (a copy is attached to this transmittal).

2. Containers are stored closed in the teaching laboratories.

3. Annual RCRA Training was completed and documented.

This years U.S. EPA inspection

No RCRA deficiencies were noted at the time of the inspection. However, the following operational recommendations are hereby presented:

1. The emergency shower at the entrance to the RCRA storage room should be tested periodically. This testing should be documented and included in the facility's inspection reports.

2. Wooden strips (perhaps 1 inch wide) should be constructed on each shelve containing chemicals. This would help prevent any breakage of bottles containing wastes if they are inadvertently moved.

3. The paint shop area has a bench top containing 3 pails of spent solvents (used in cleaning paint brushes). Although, these pails were covered at the time of this unannounced inspection, the odor of paint solvents was evident. It is recommemded that a ventillation vent be installed along the top side of the bench in order to reduce the amount of volatiles at this area.

Attached to this inspection report is a completed Illinois EPA checklist. If you have any questions concerning this inspection, please call me at (312) 886-1968.